

# **EXHIBIT 31**

HIGHLY CONFIDENTIAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE  
CENTRE GMBH and WEST PUBLISHING  
CORPORATION,

Plaintiffs/Counterdefendants

v.

ROSS INTELLIGENCE INC.,

Defendant/Counterclaimant.

1:20-cv-00613-SB

**CONFIDENTIAL, HIGHLY  
CONFIDENTIAL – ATTORNEYS' EYES  
ONLY**

**REPORT OF DEFENDANT/COUNTERCLAIMANT'S EXPERT  
GILLIAN K. HADFIELD, J.D., PH.D.**

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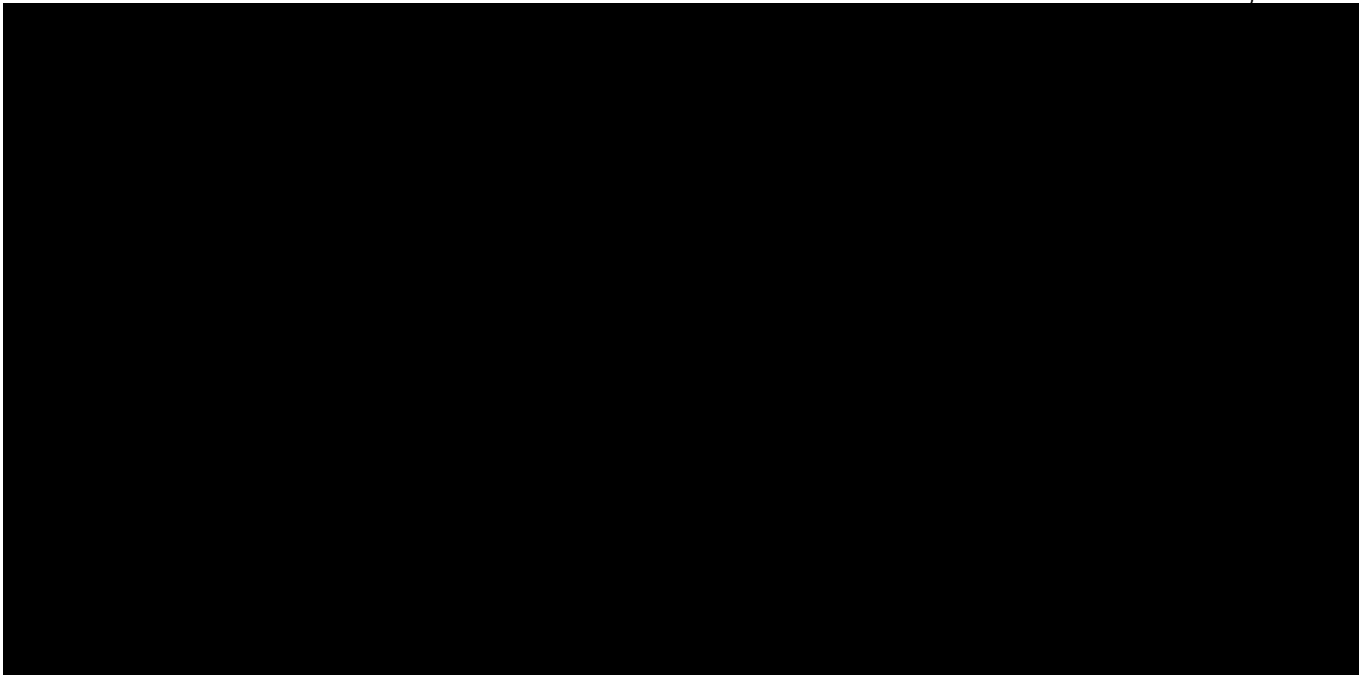
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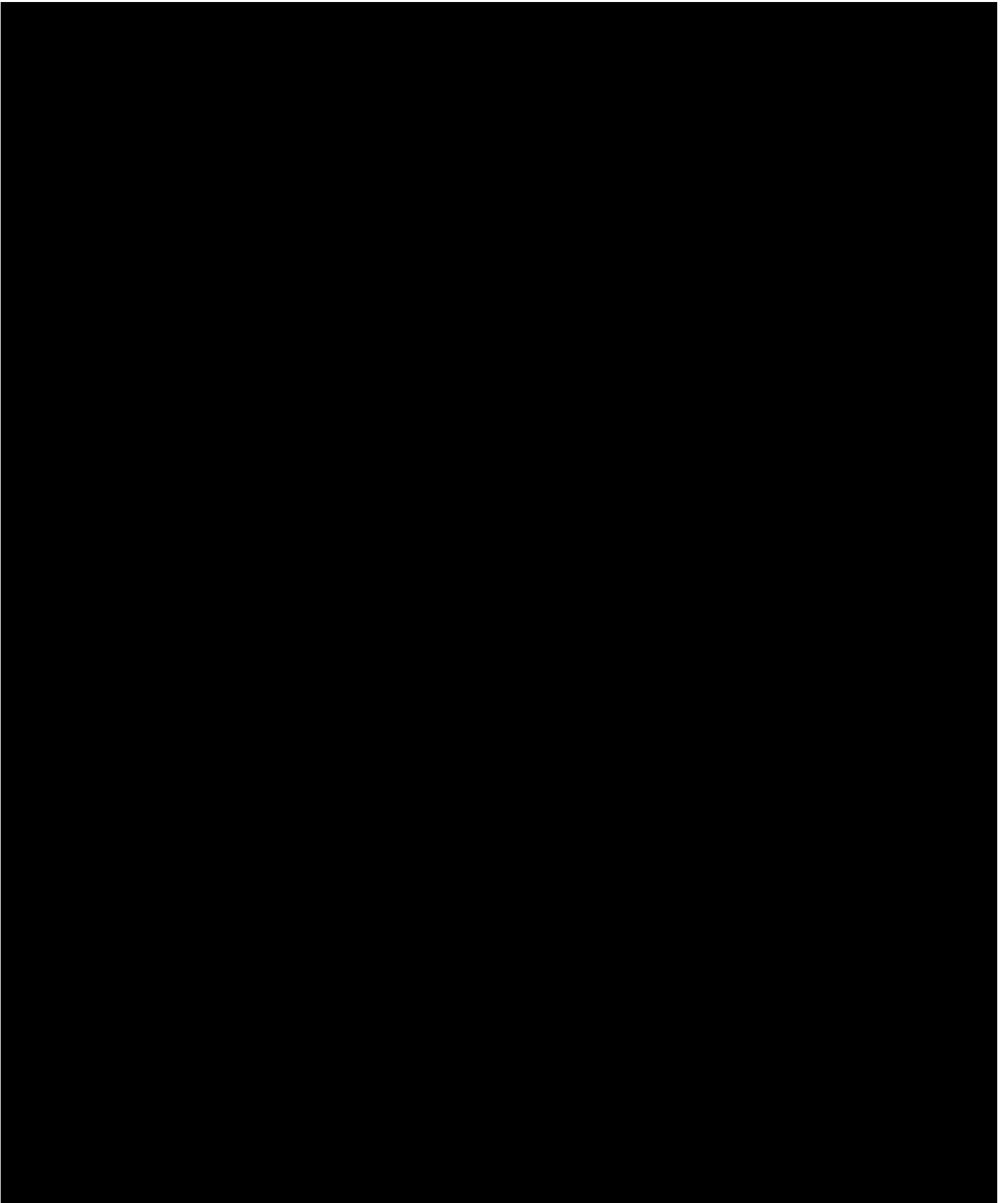
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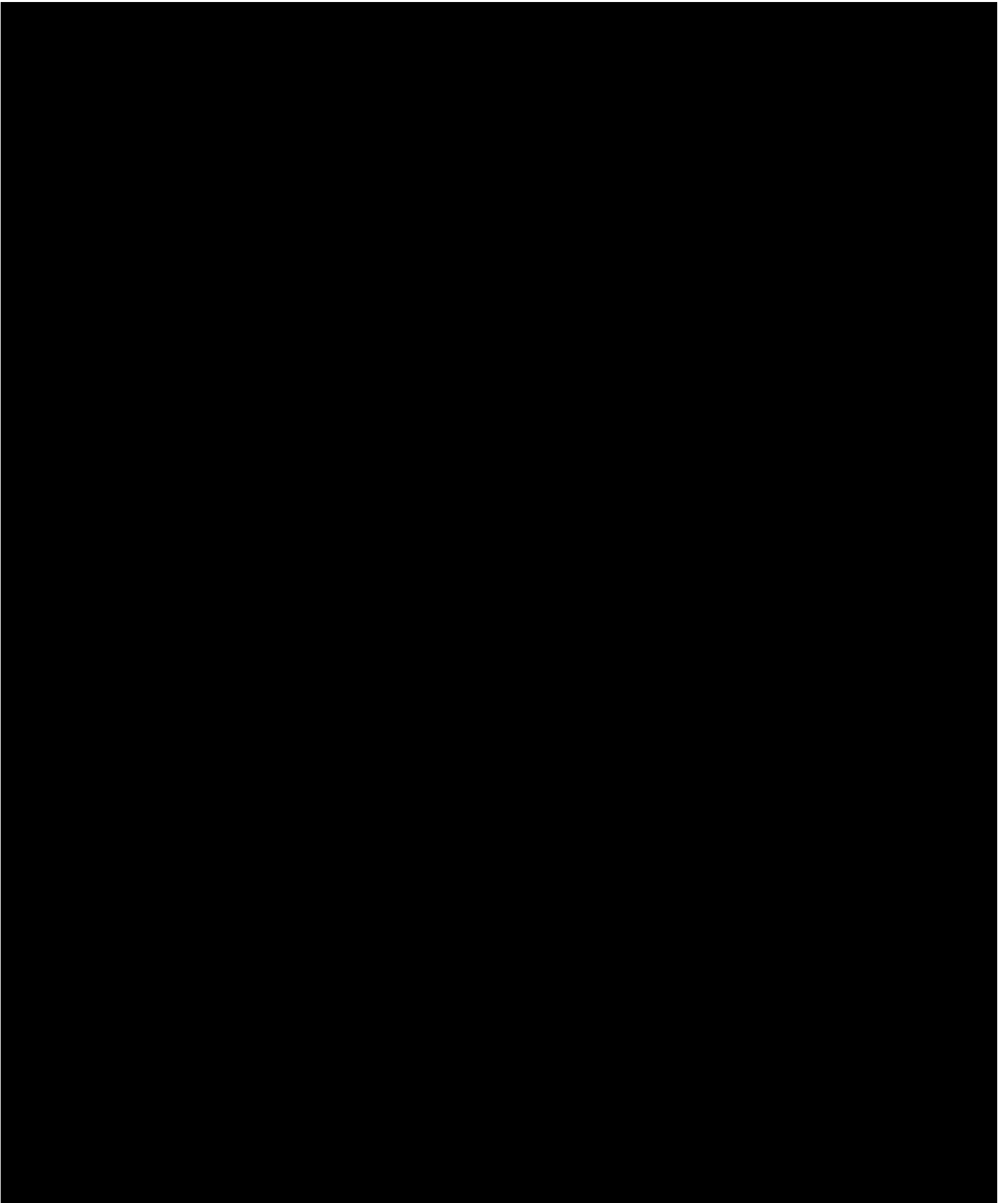
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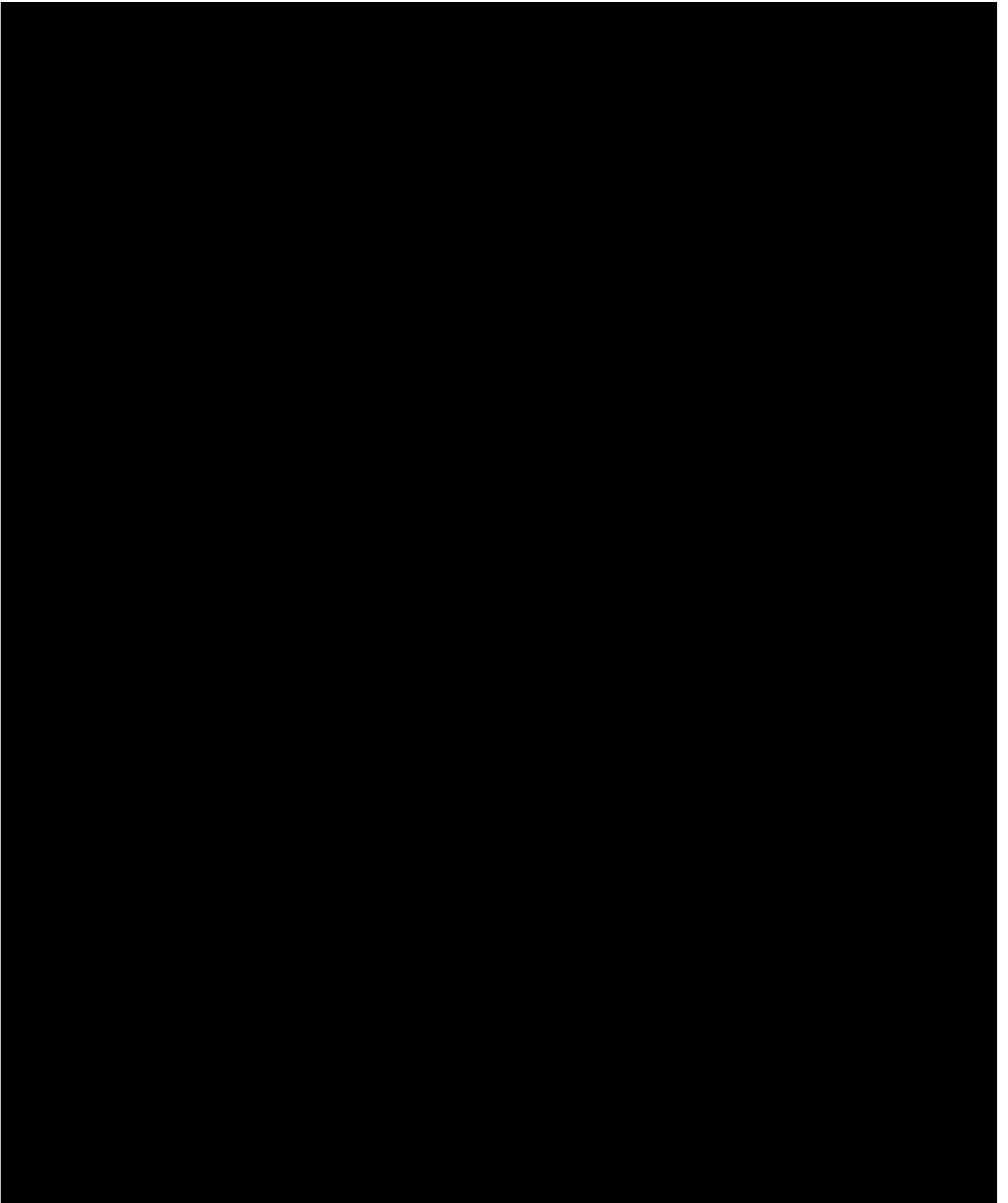
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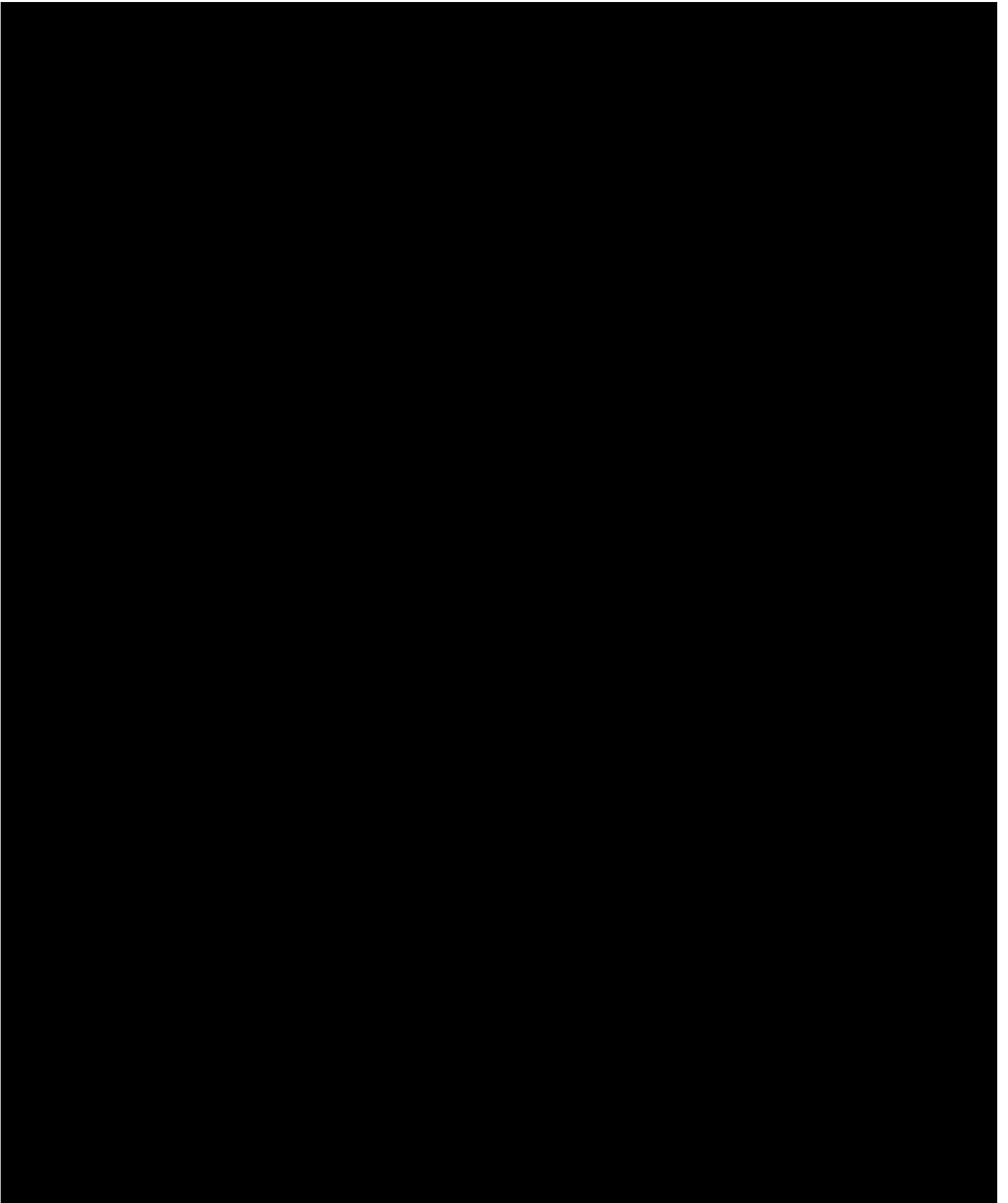
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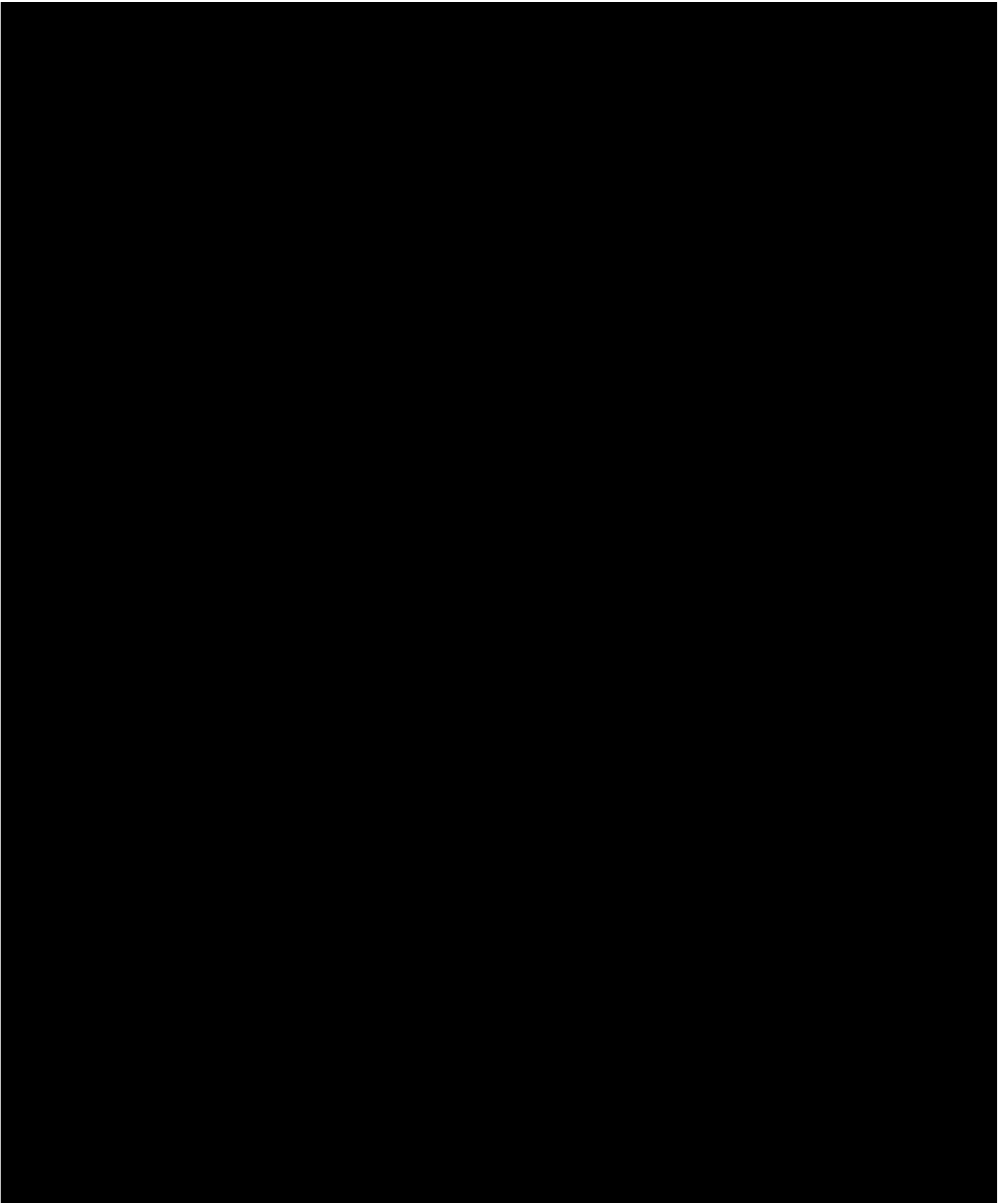
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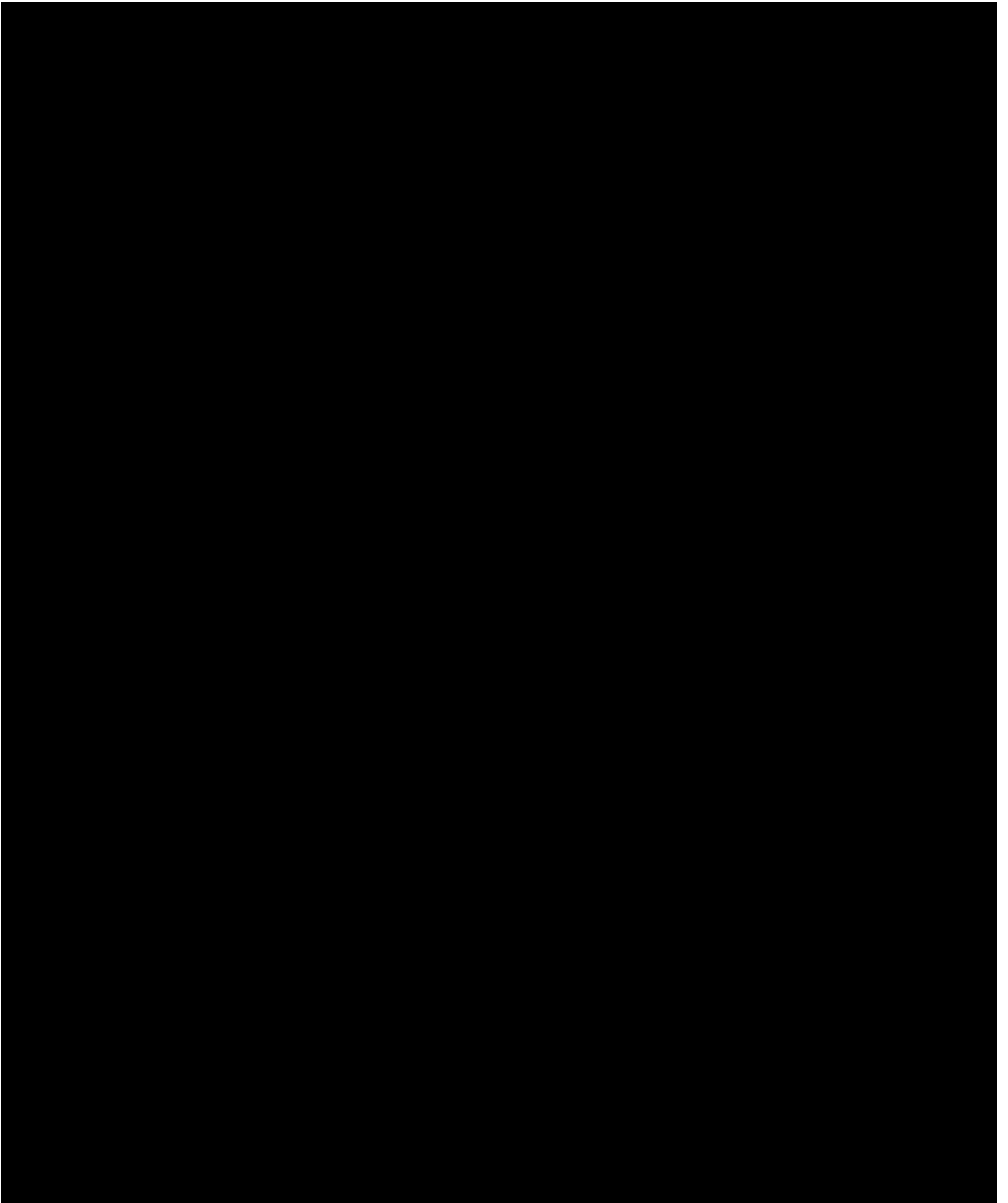


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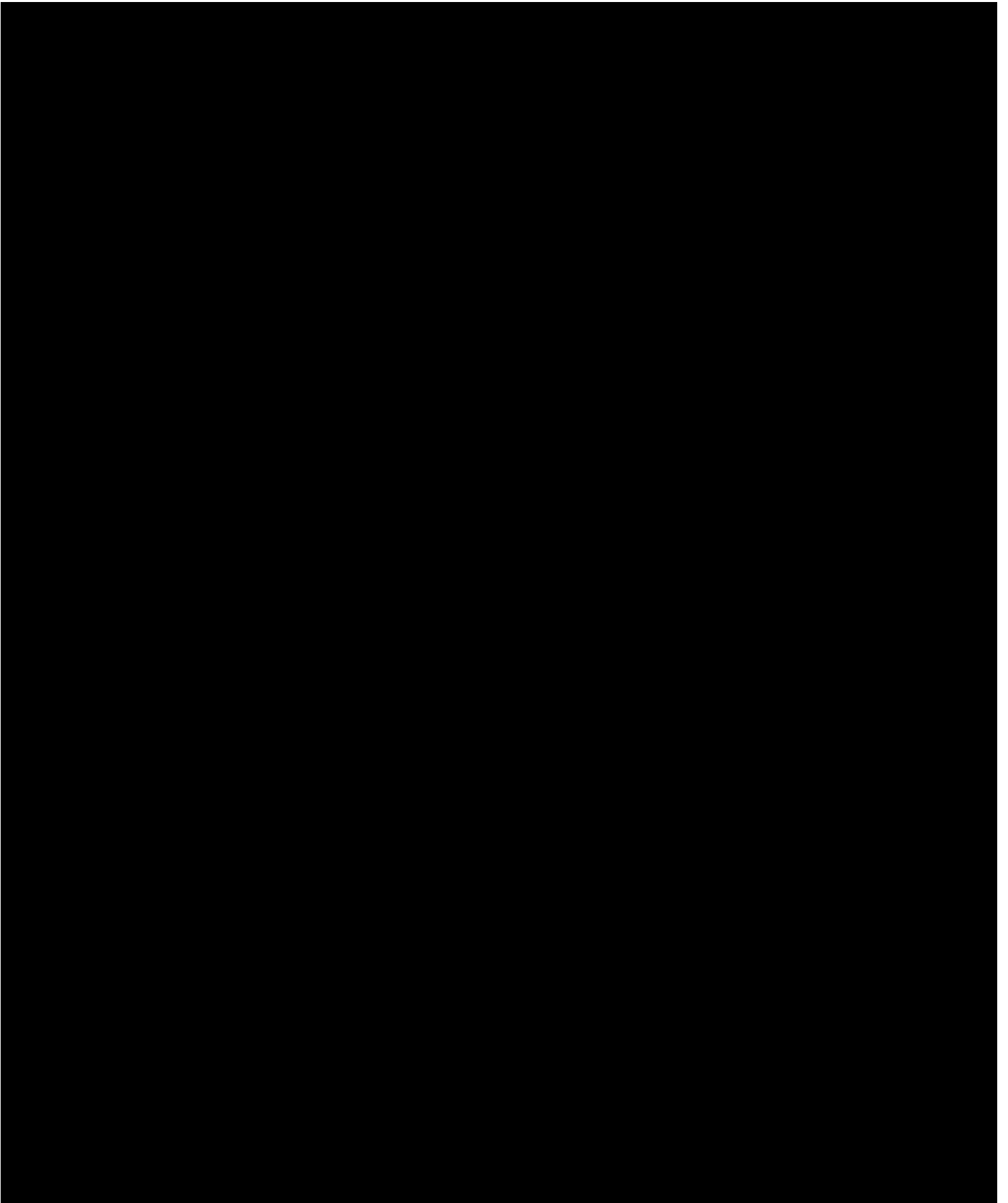




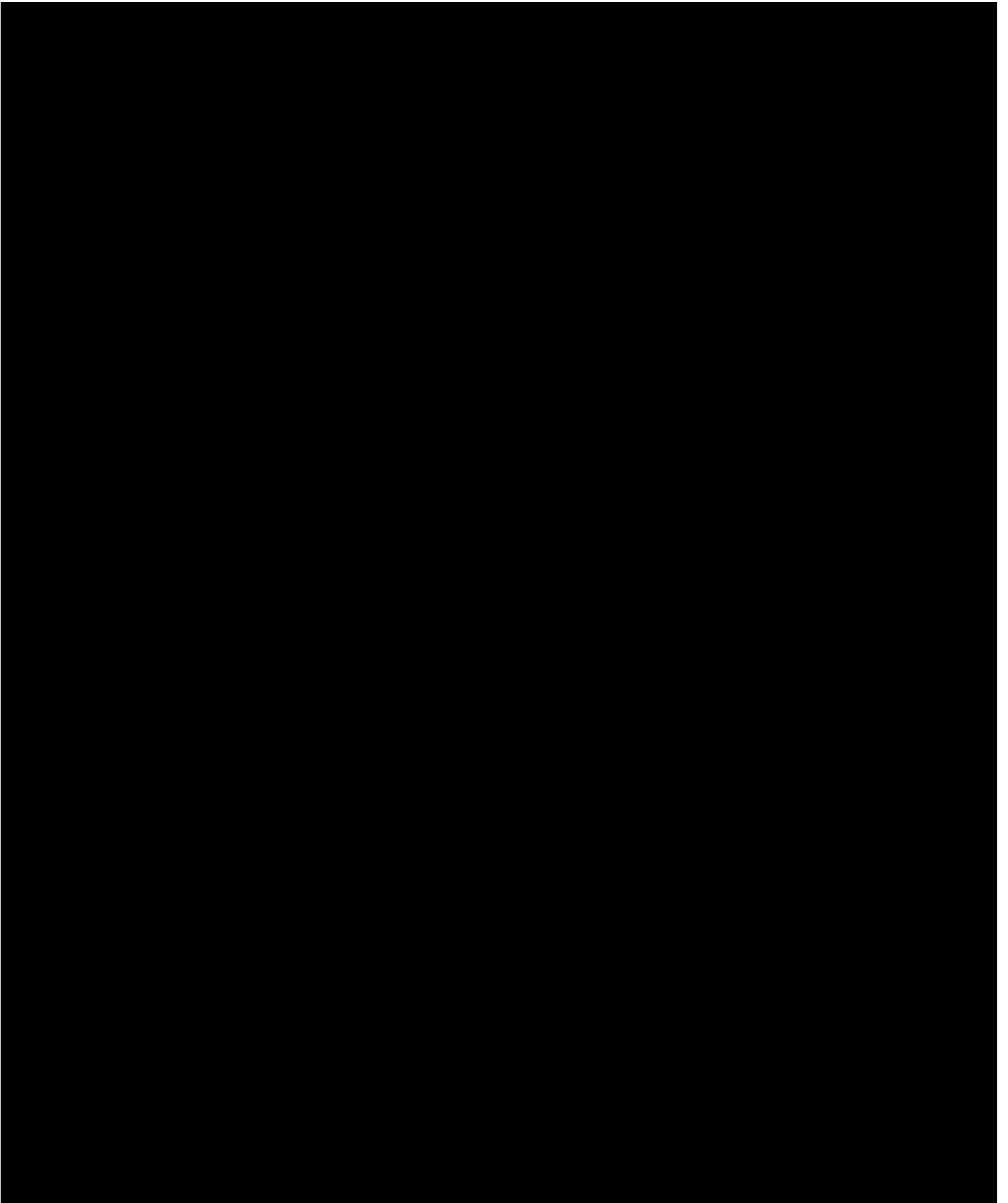
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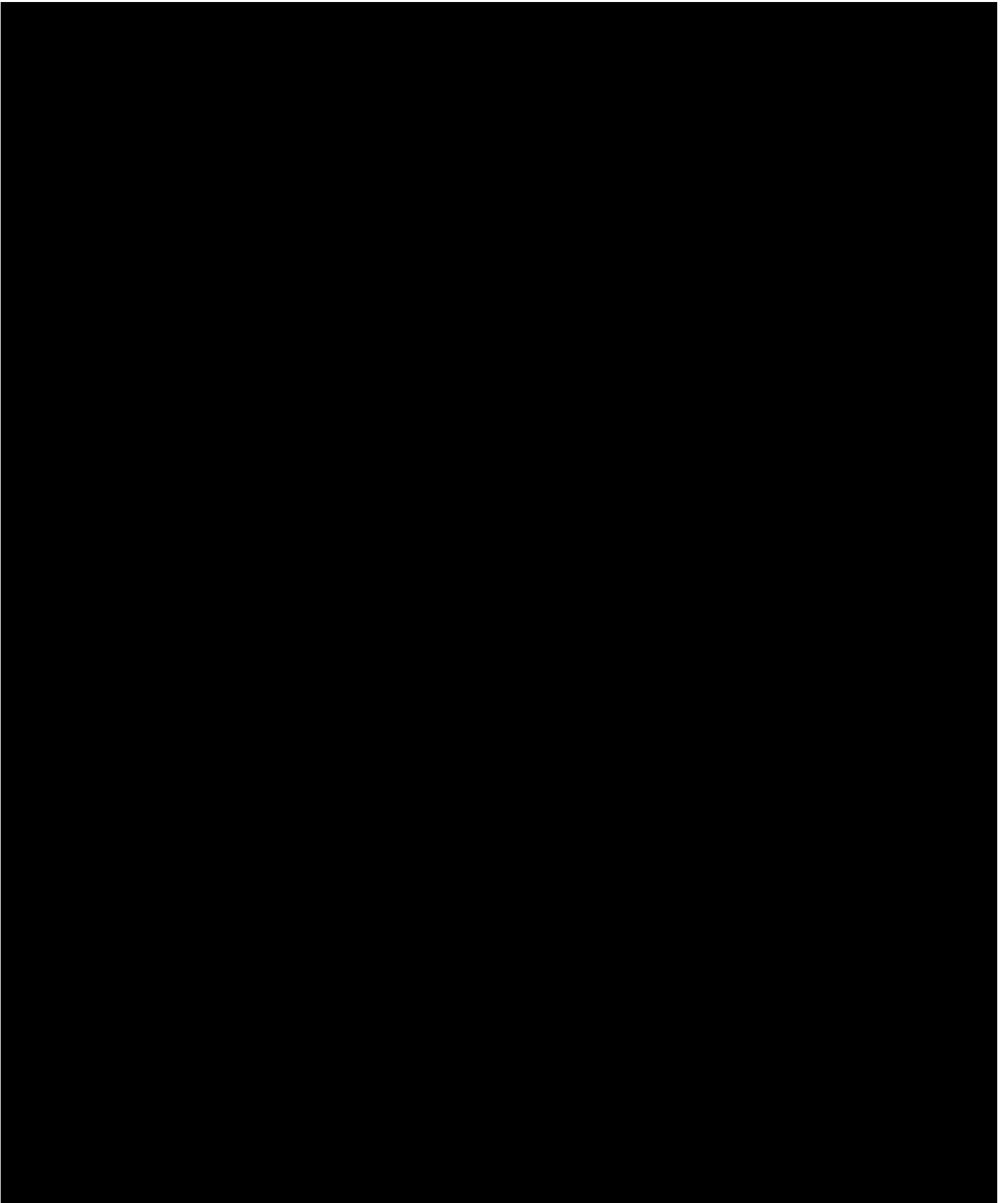
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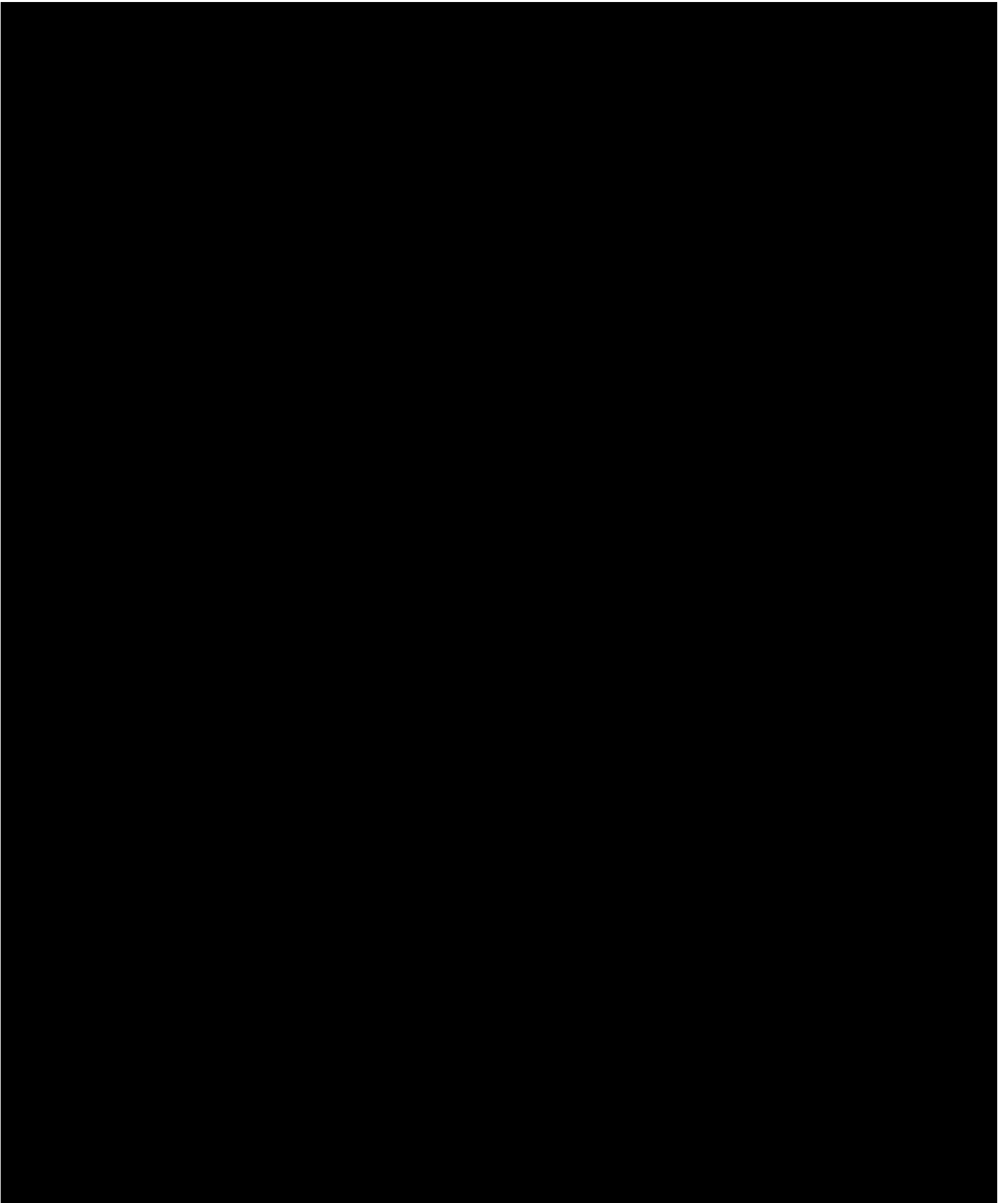
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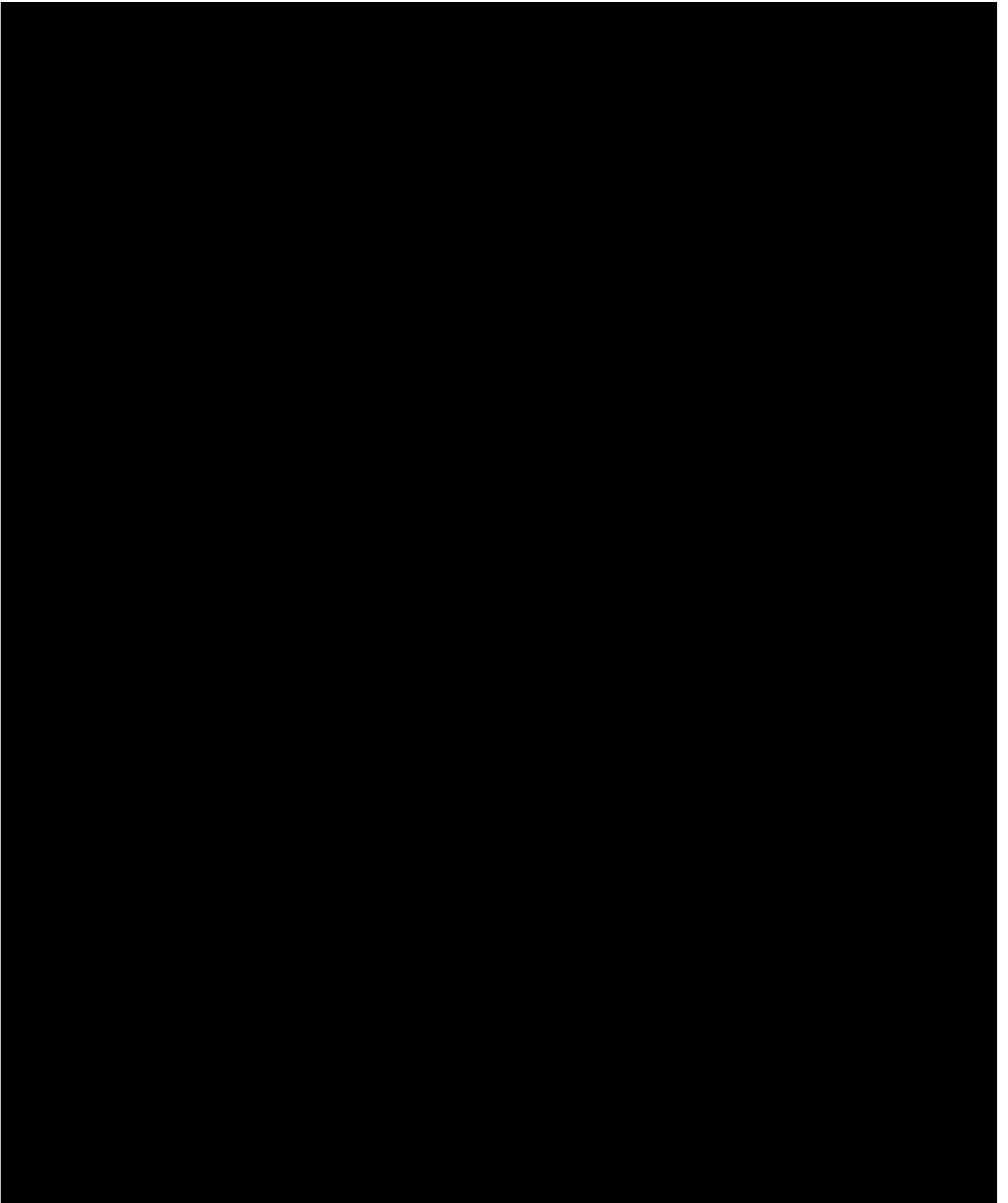
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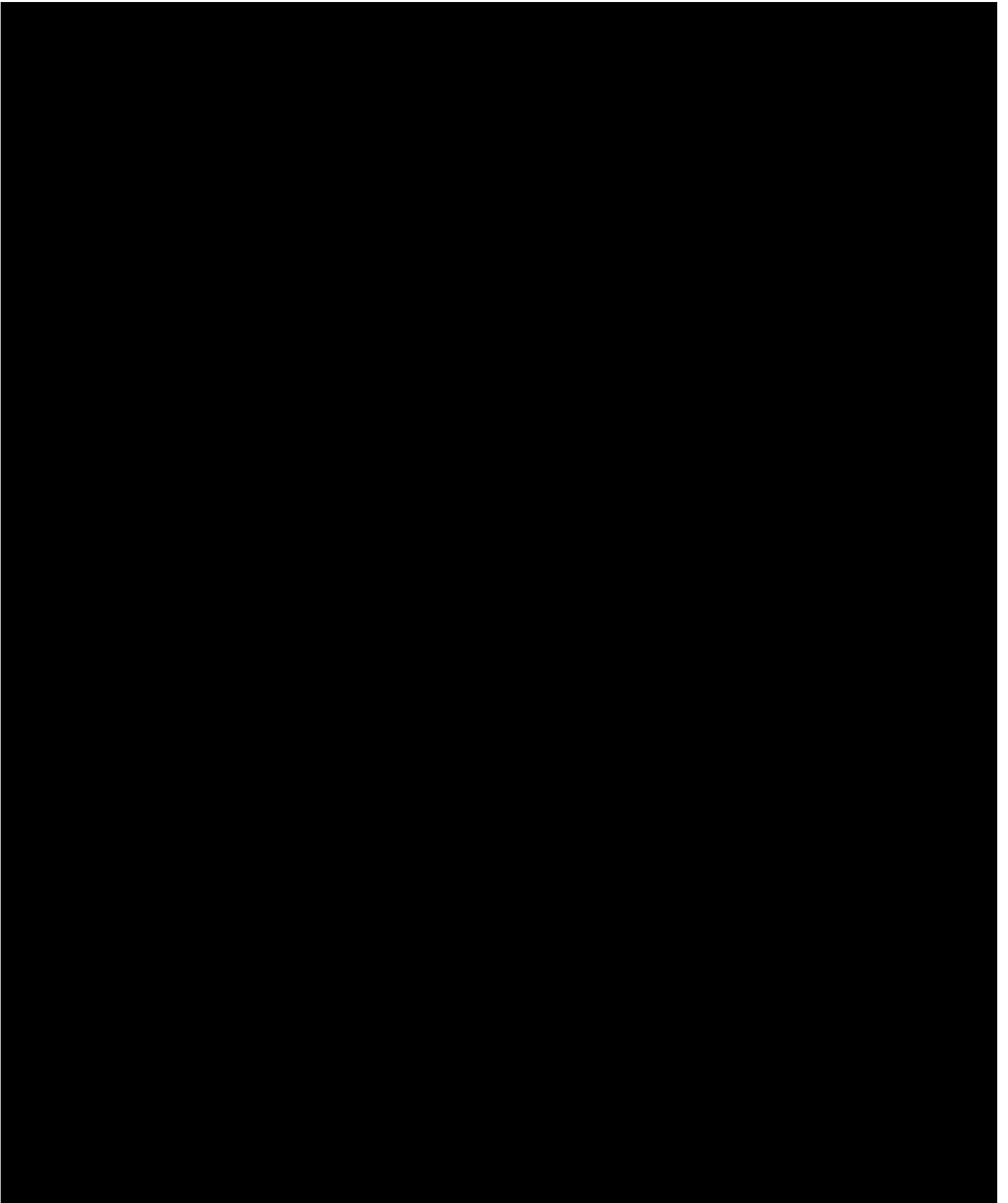
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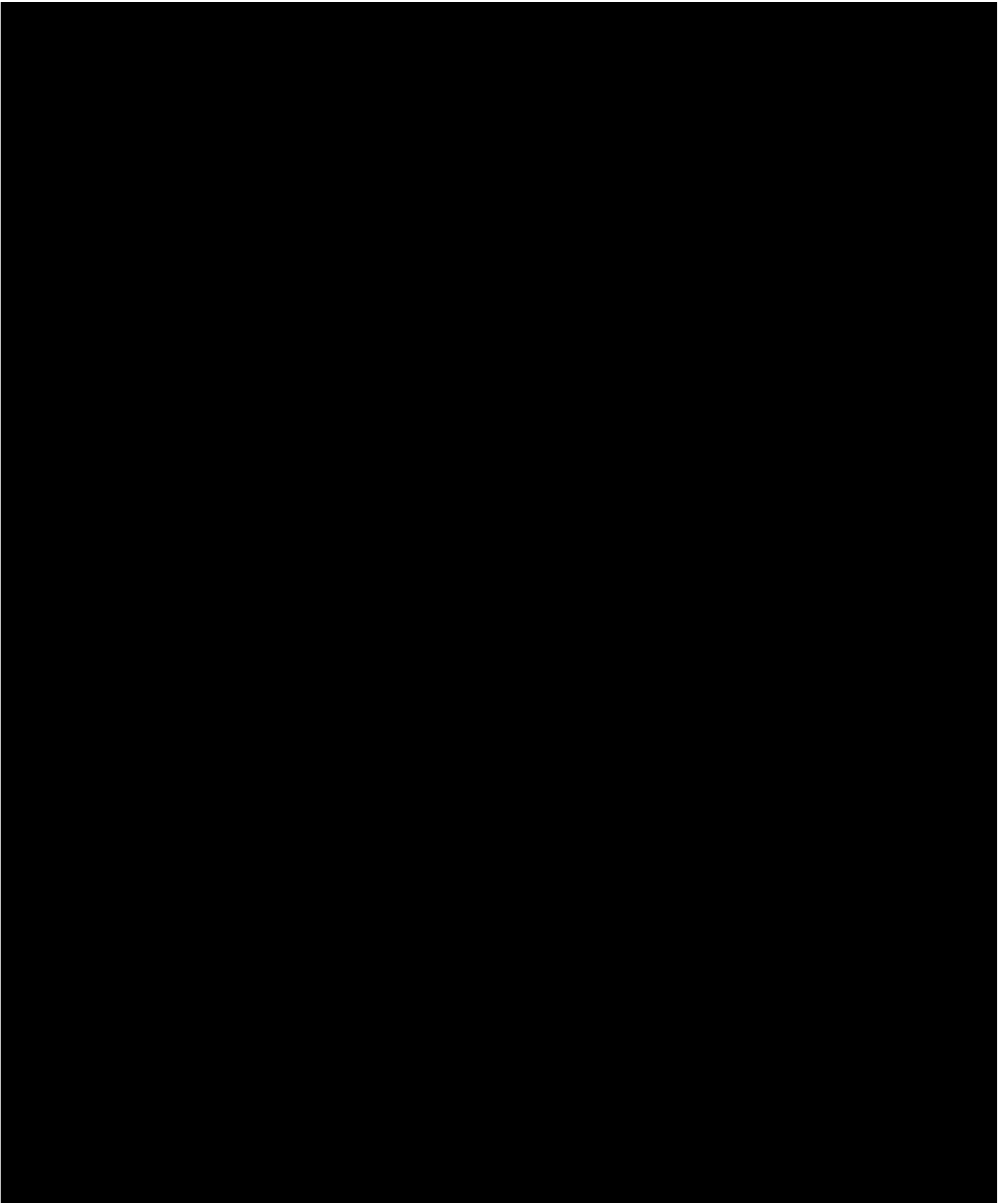
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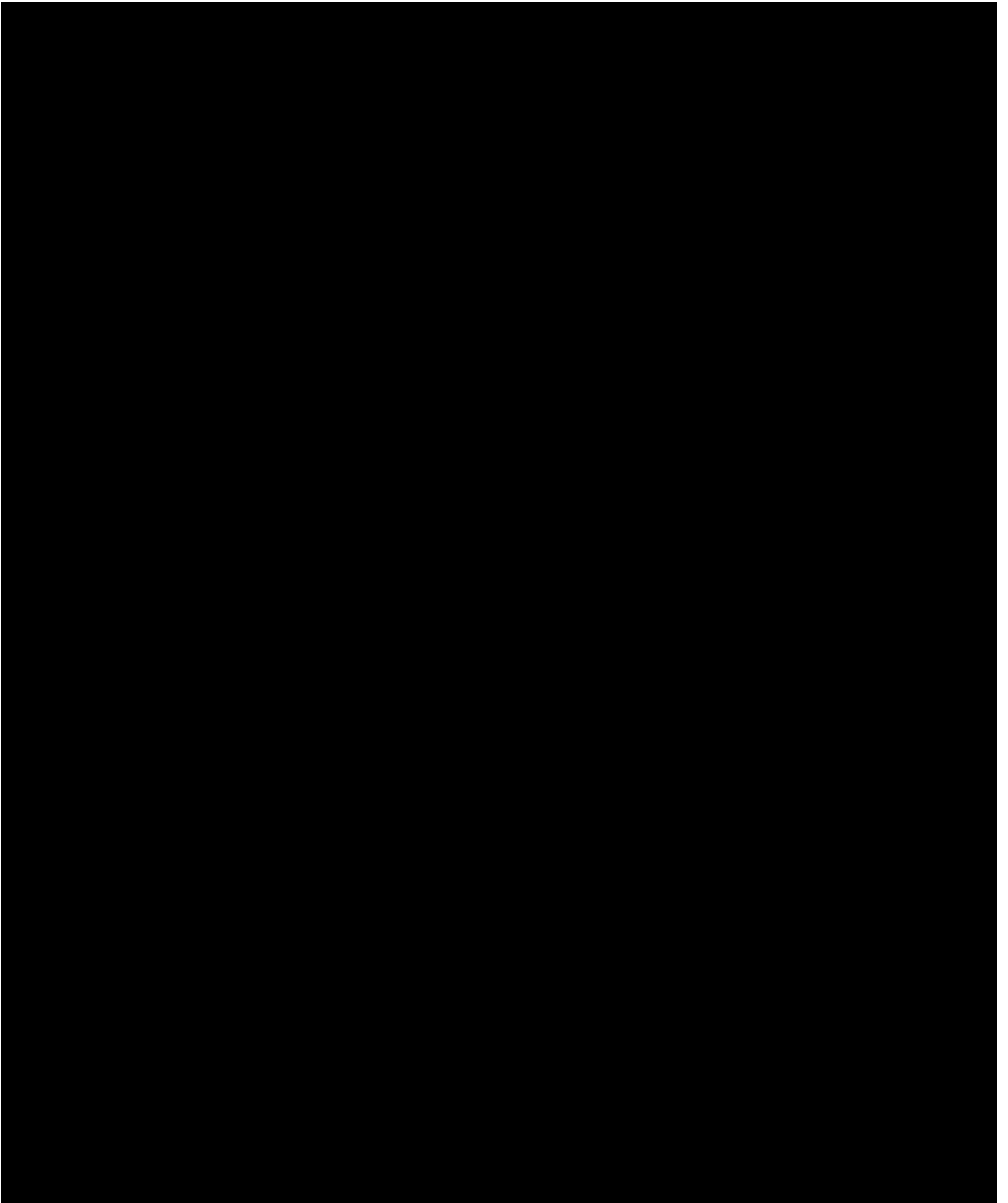


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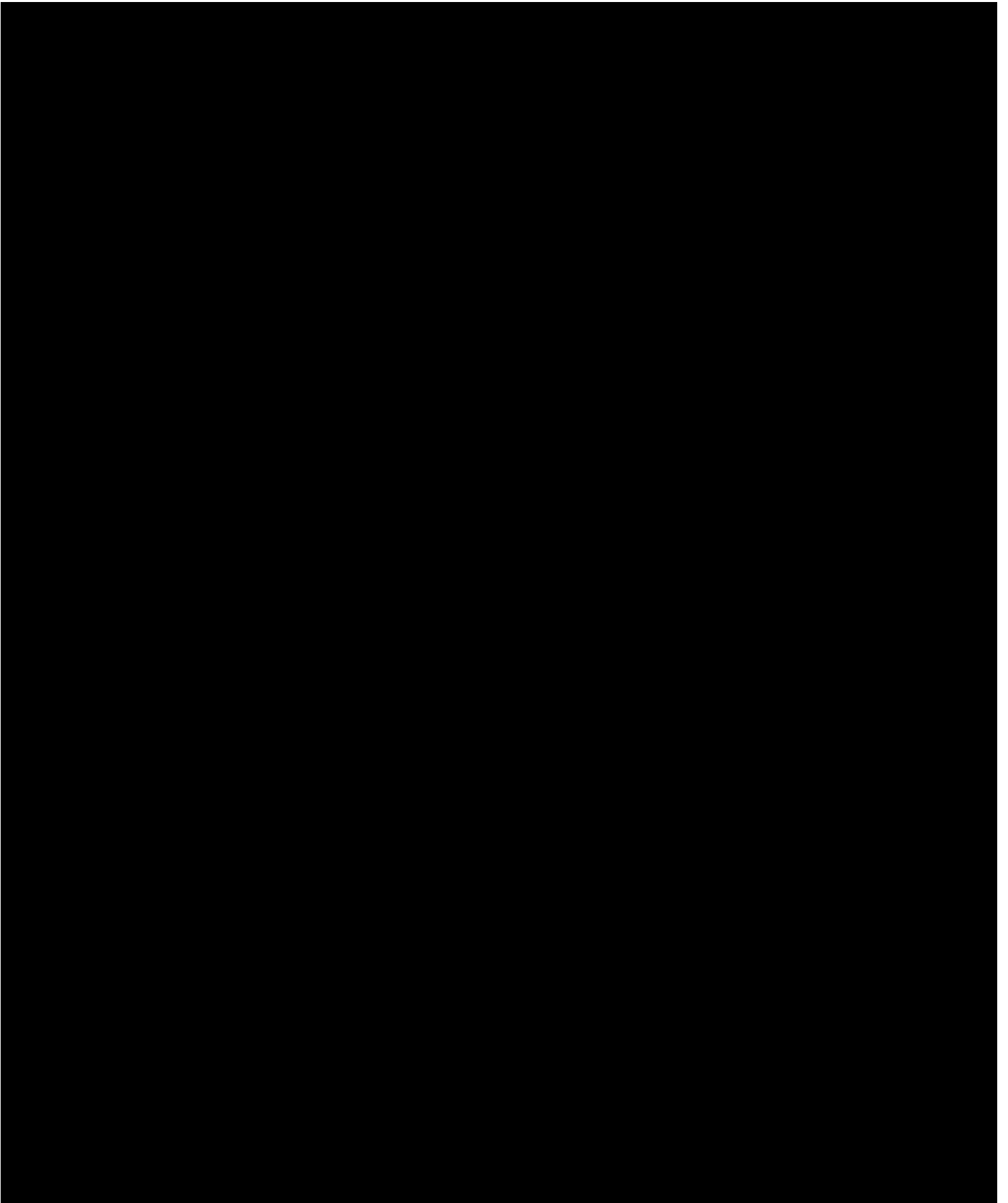




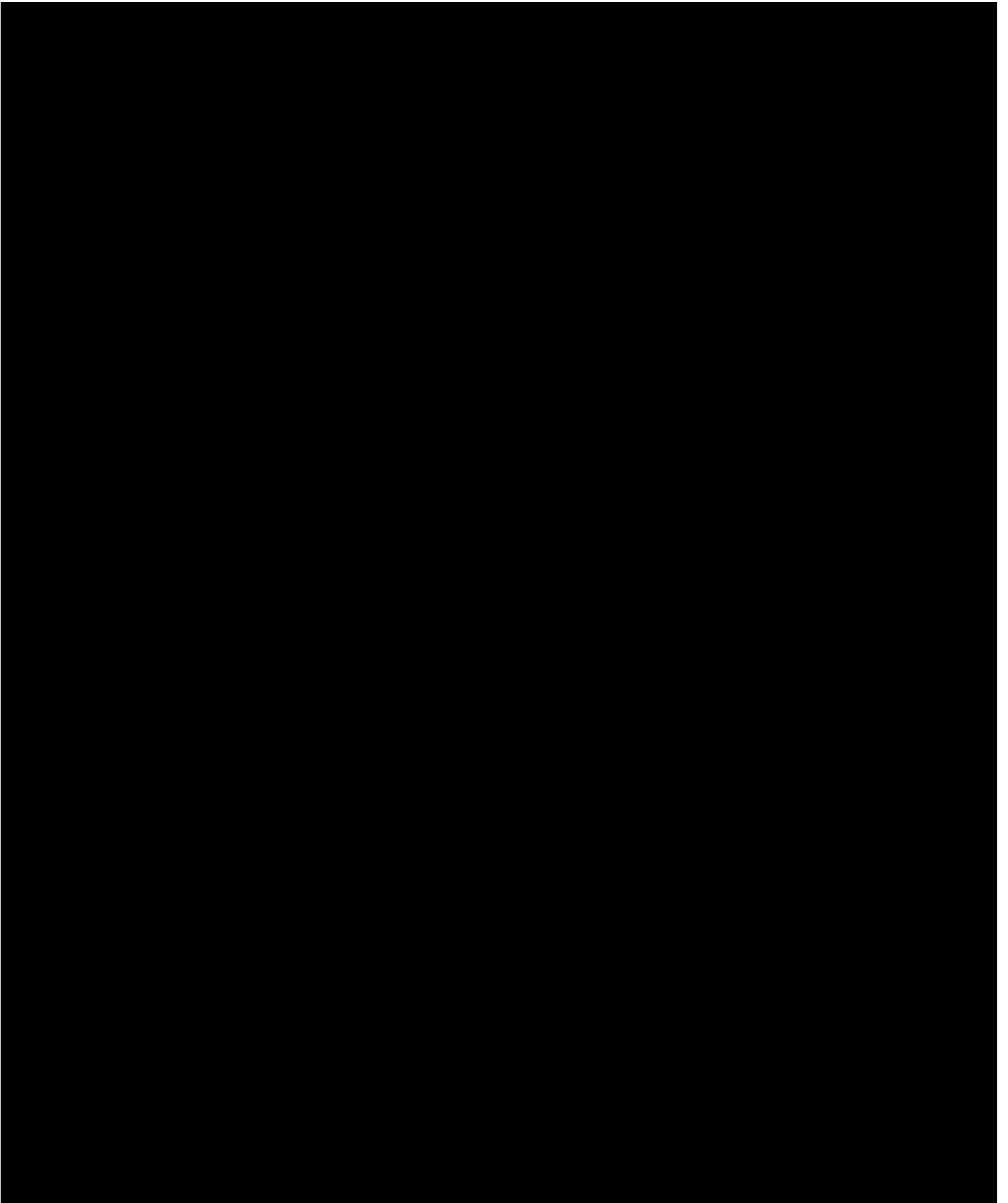
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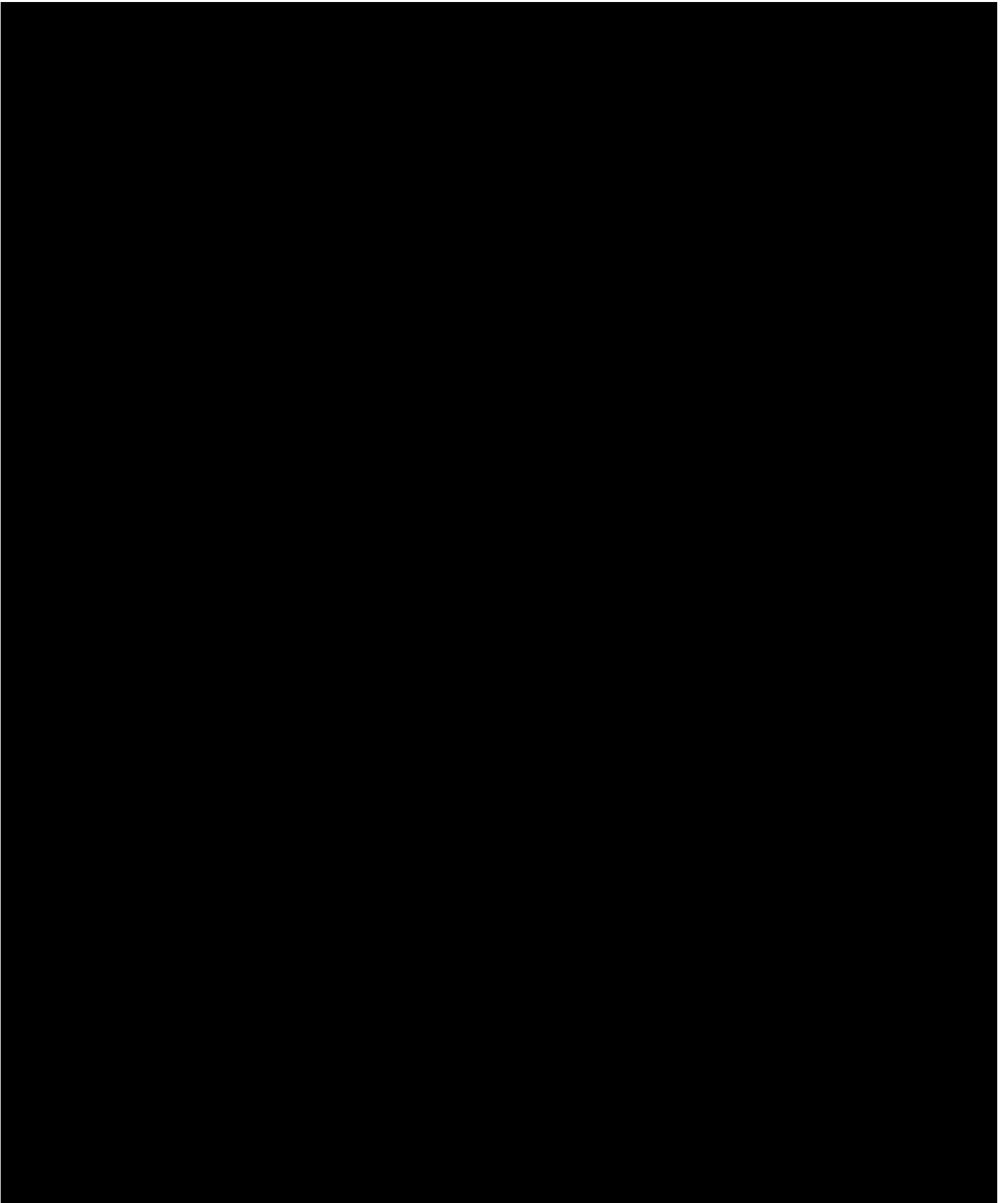
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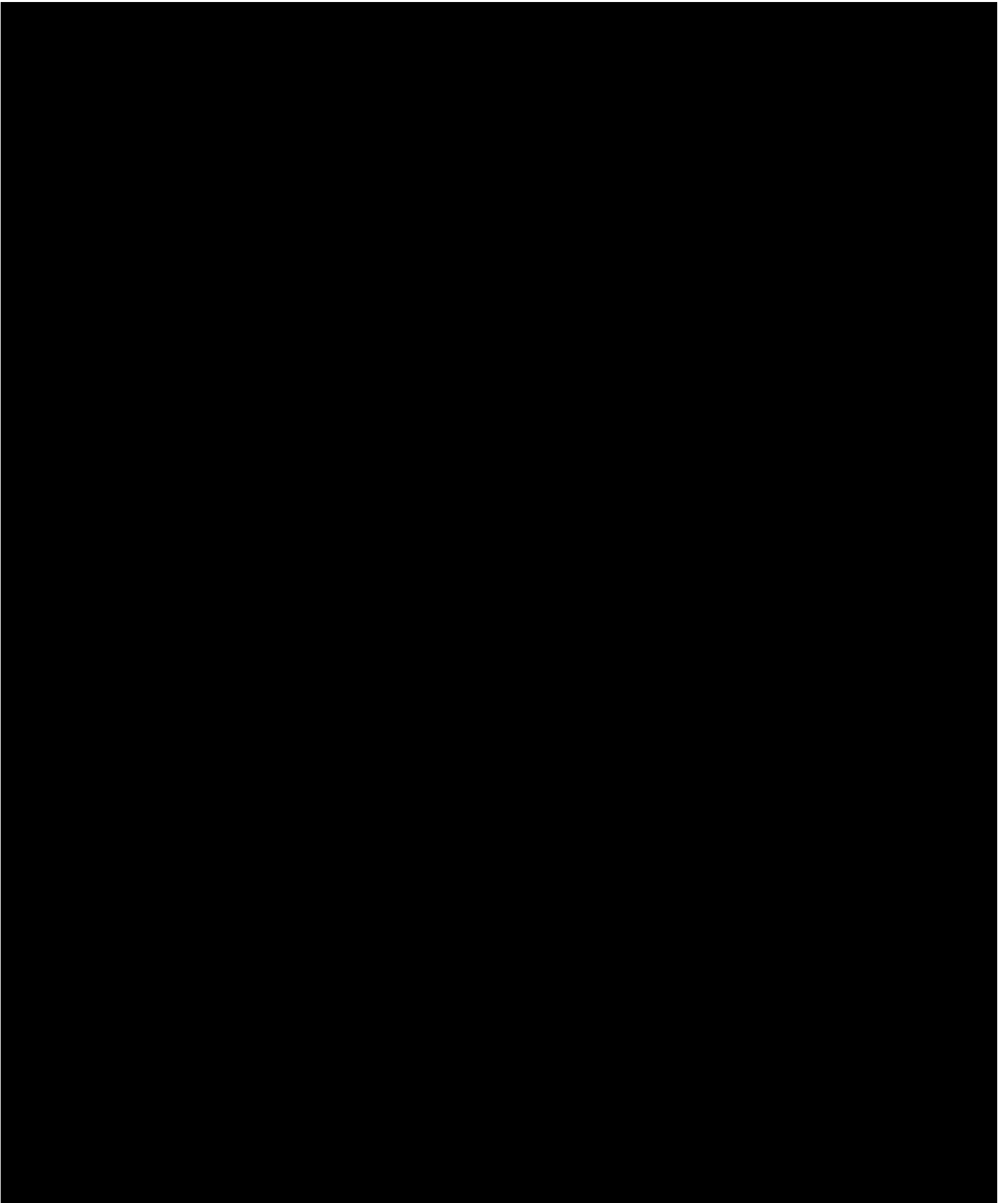
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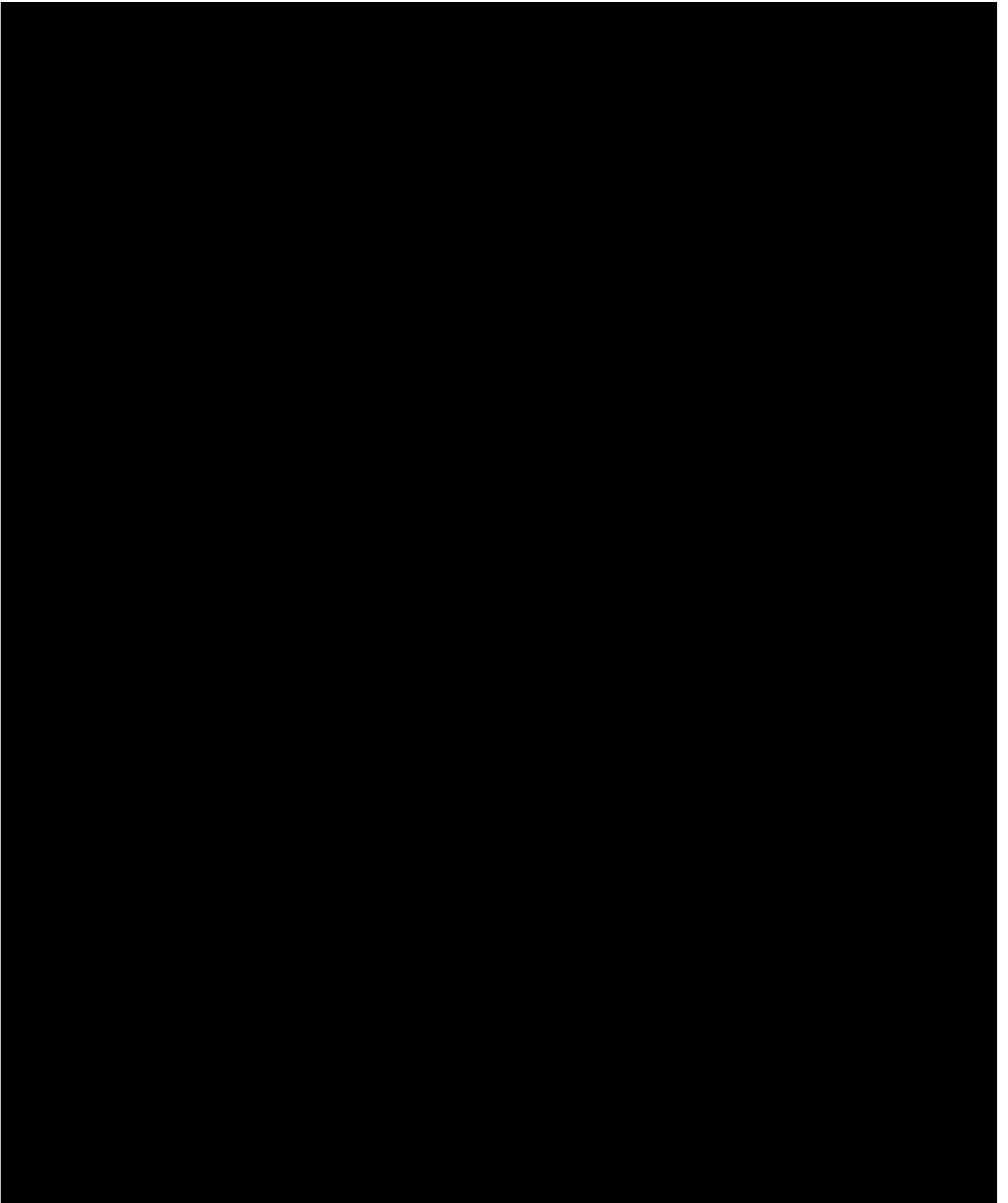
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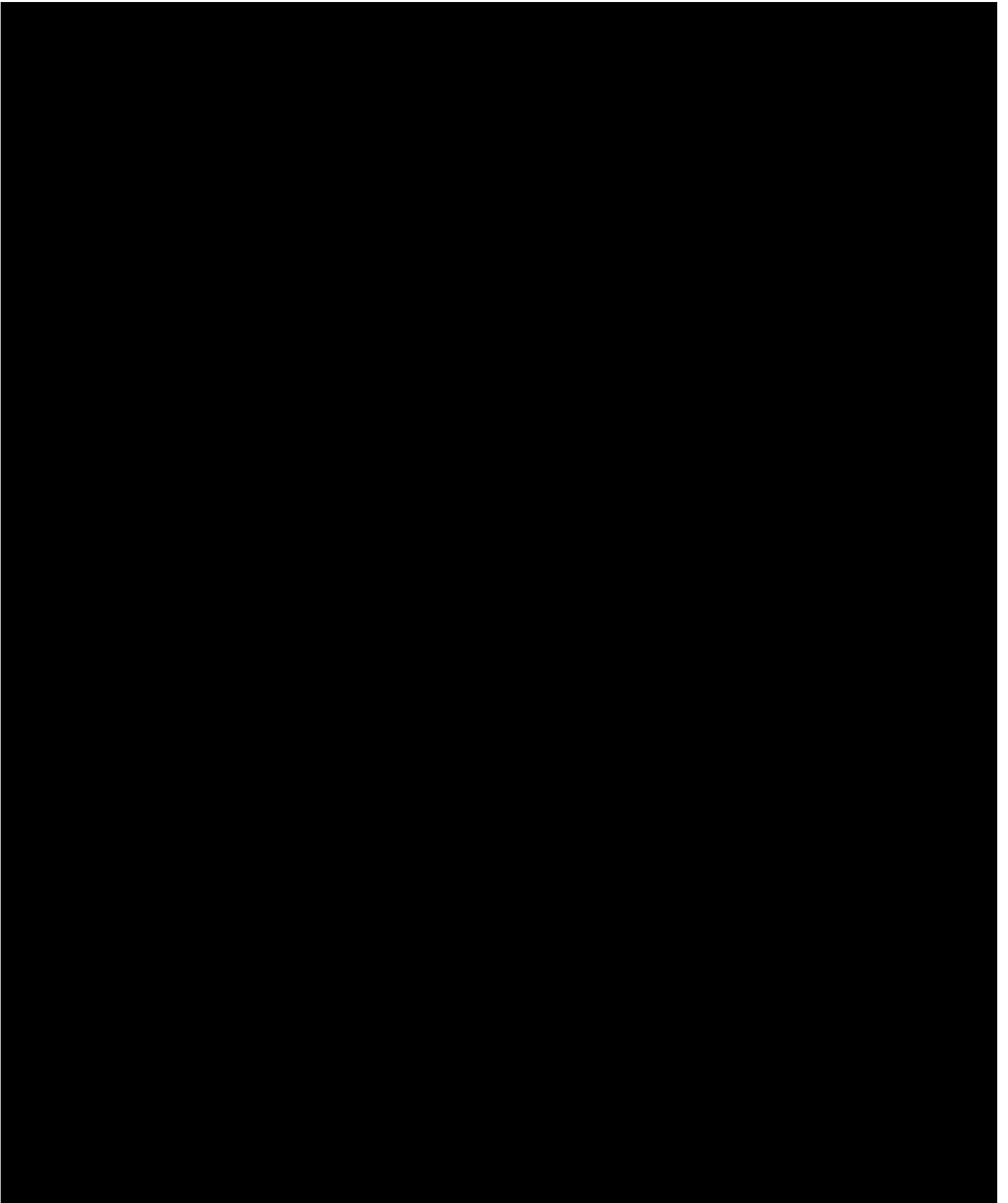
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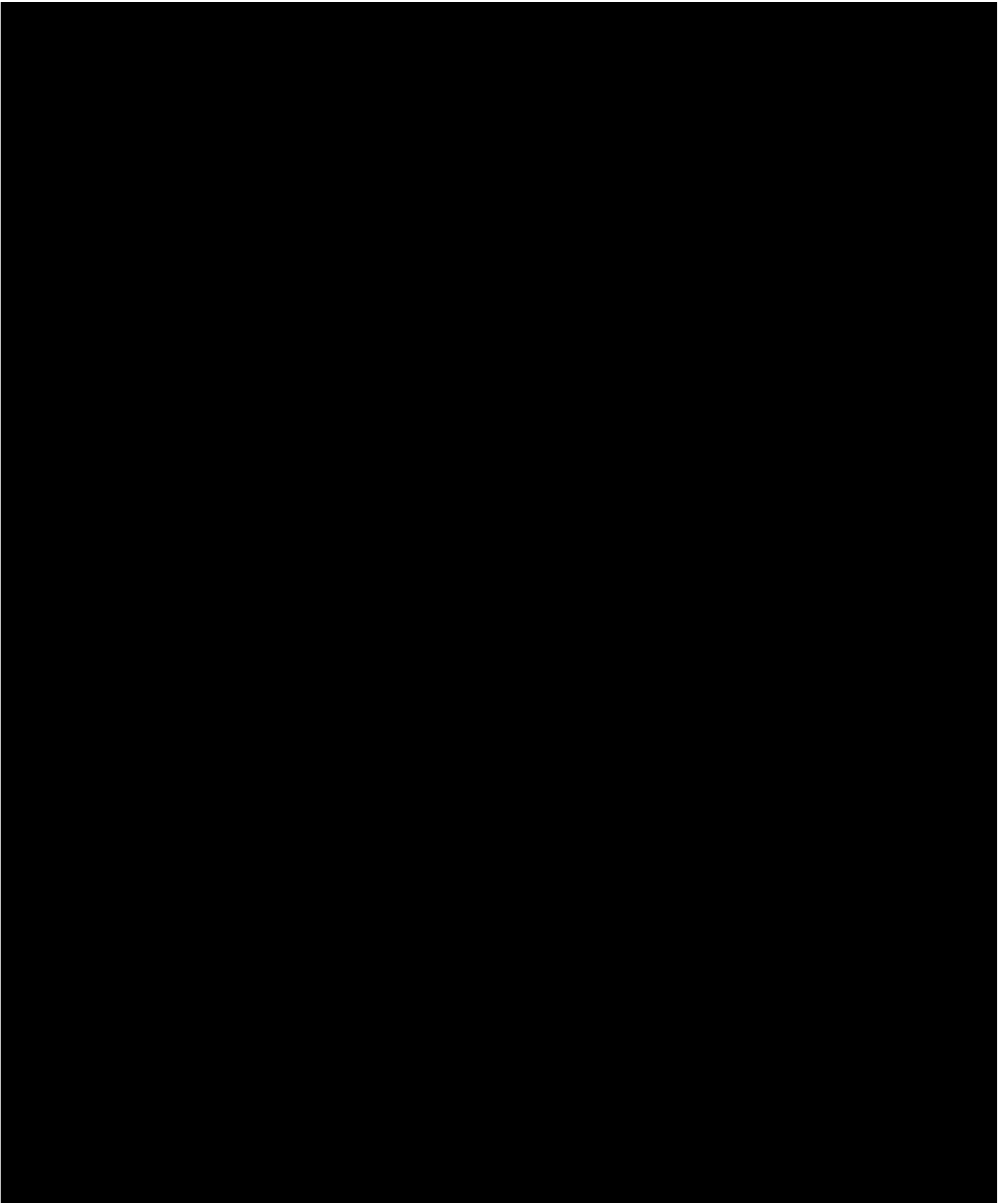
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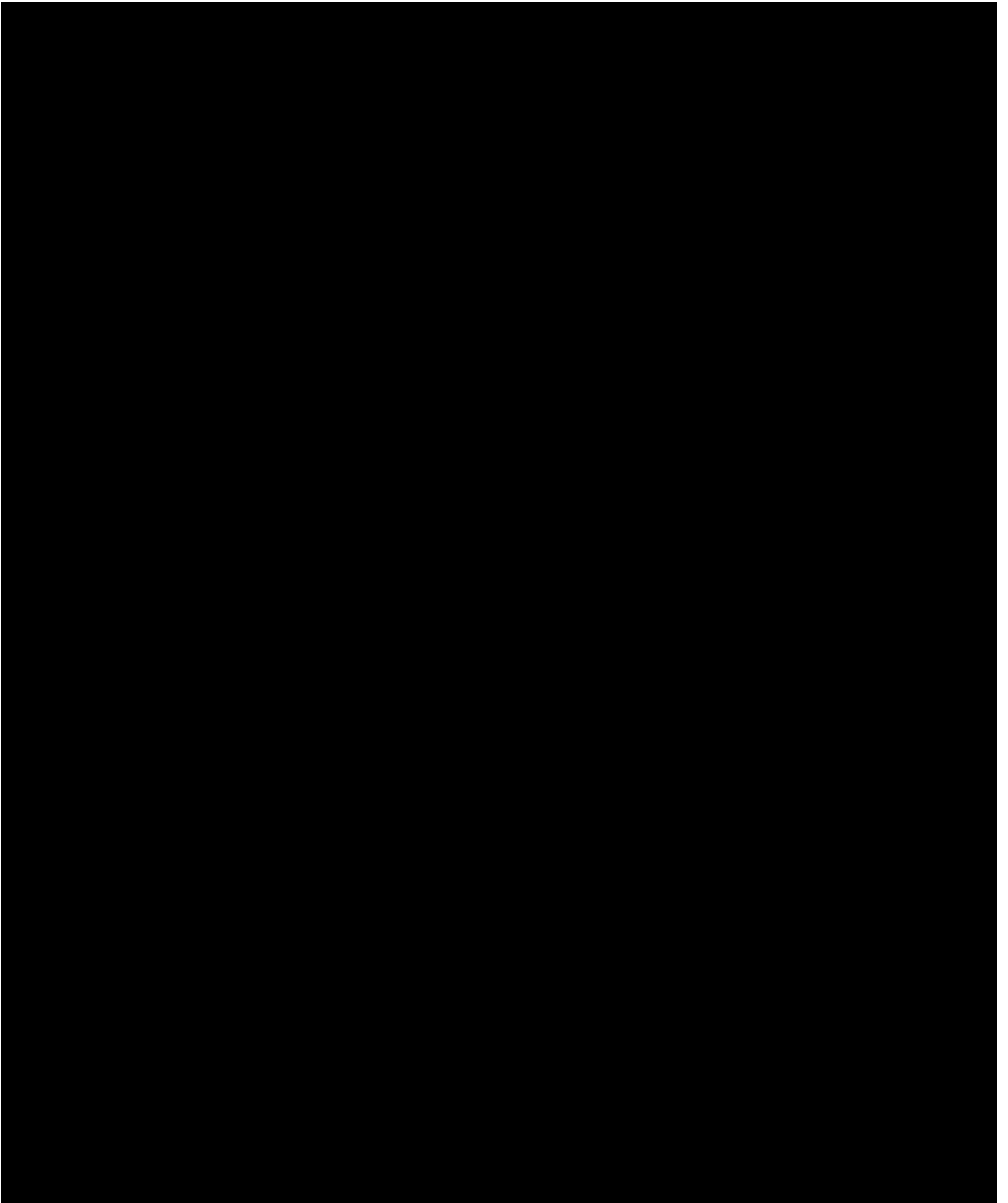


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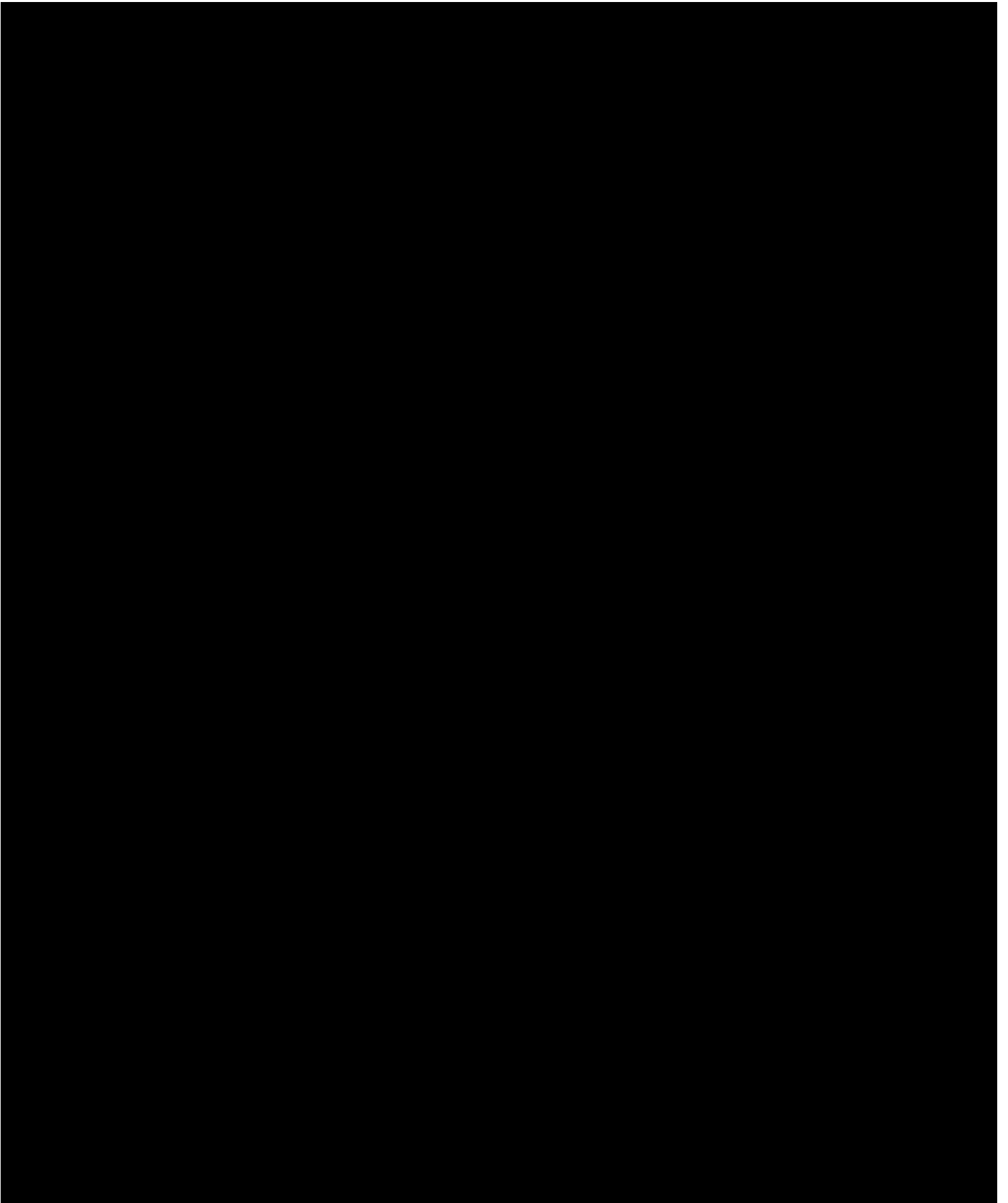




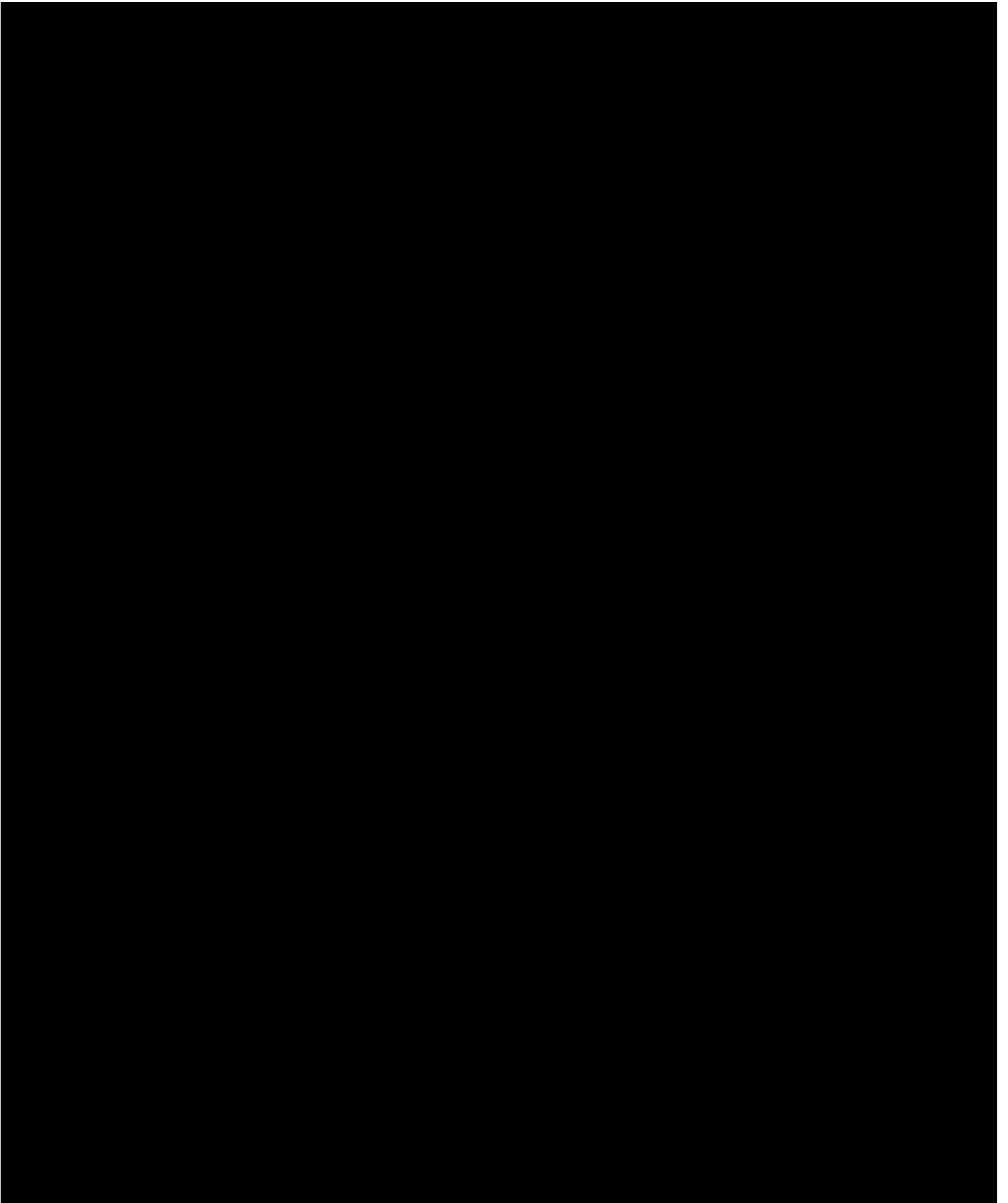
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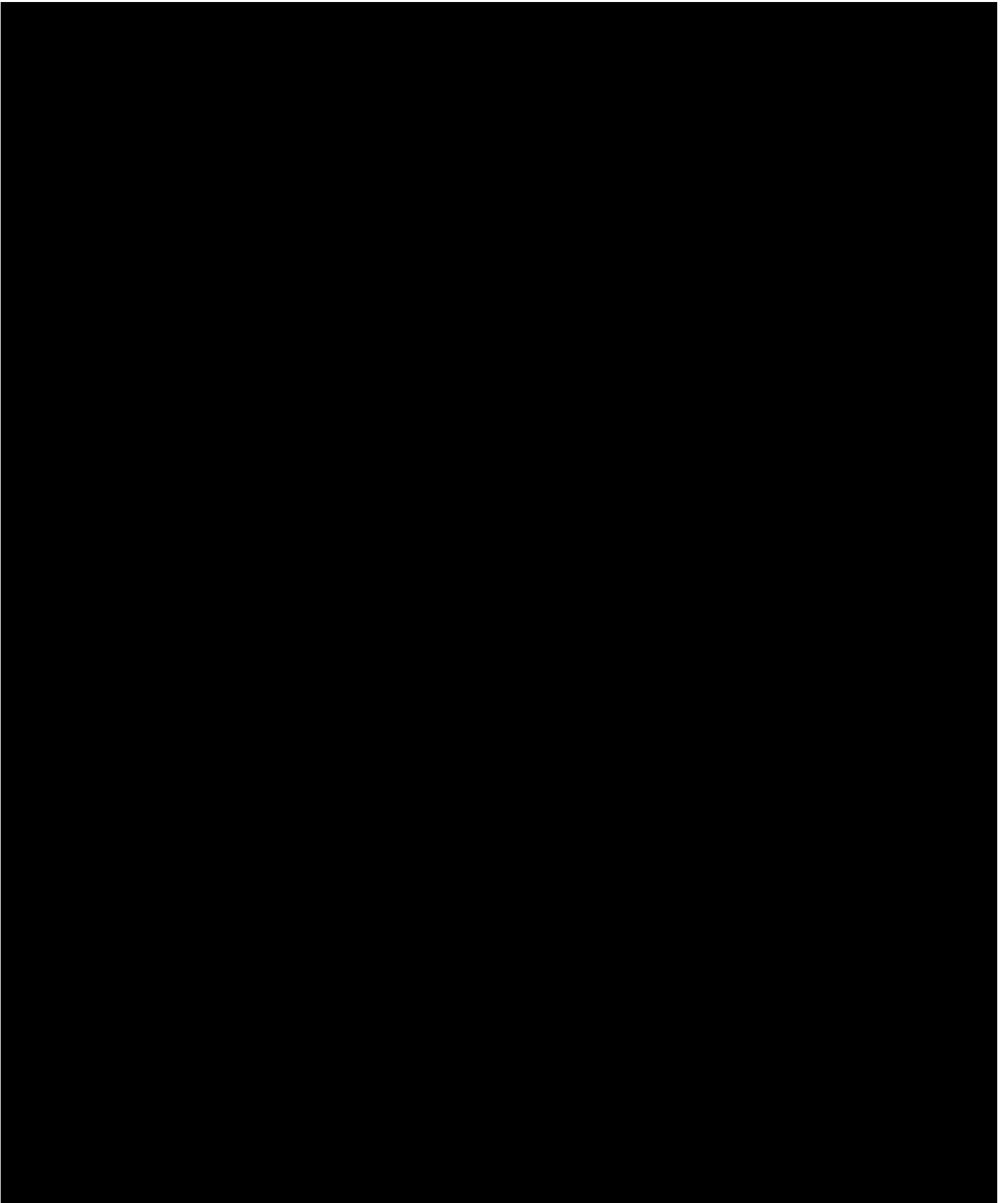
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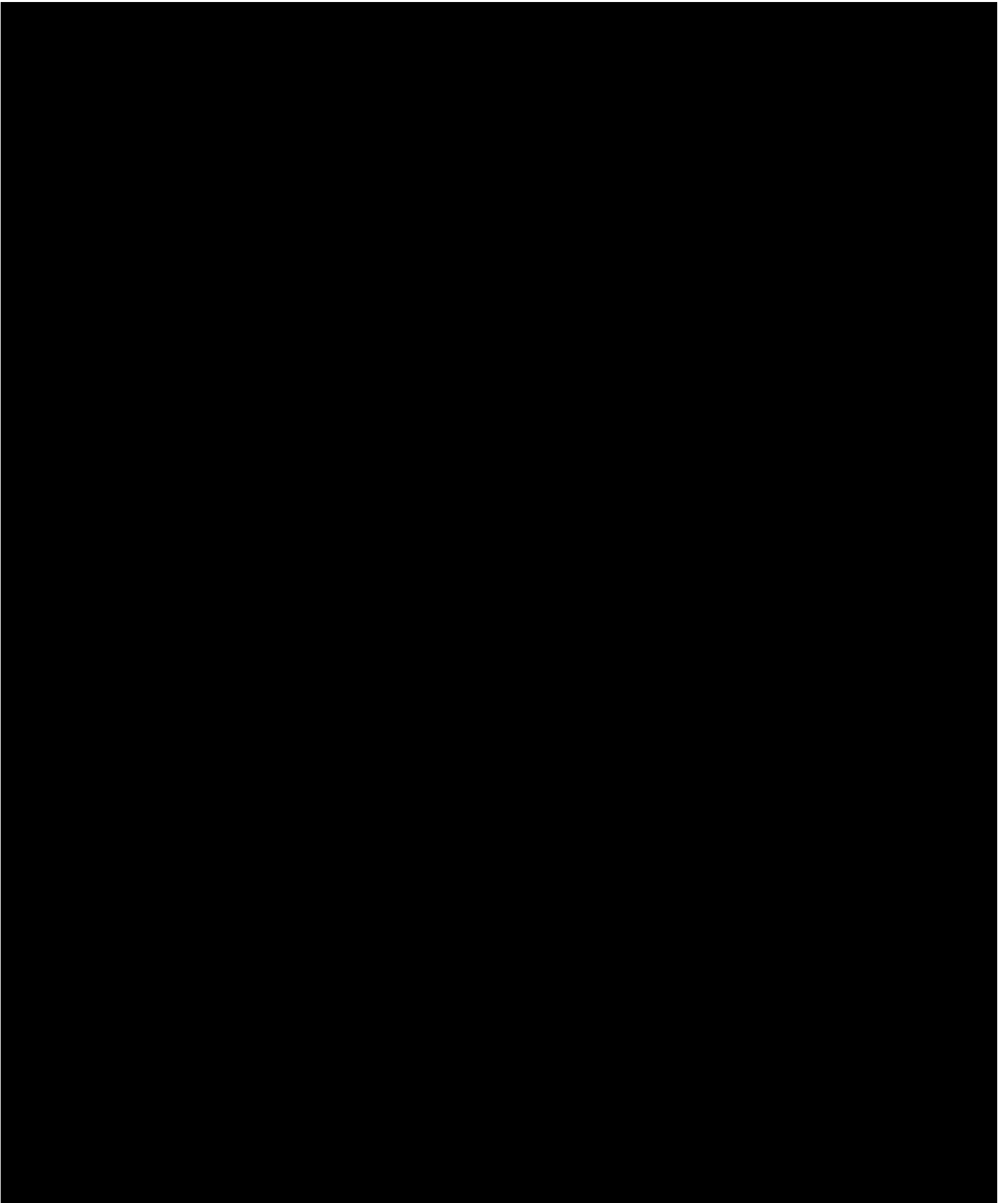
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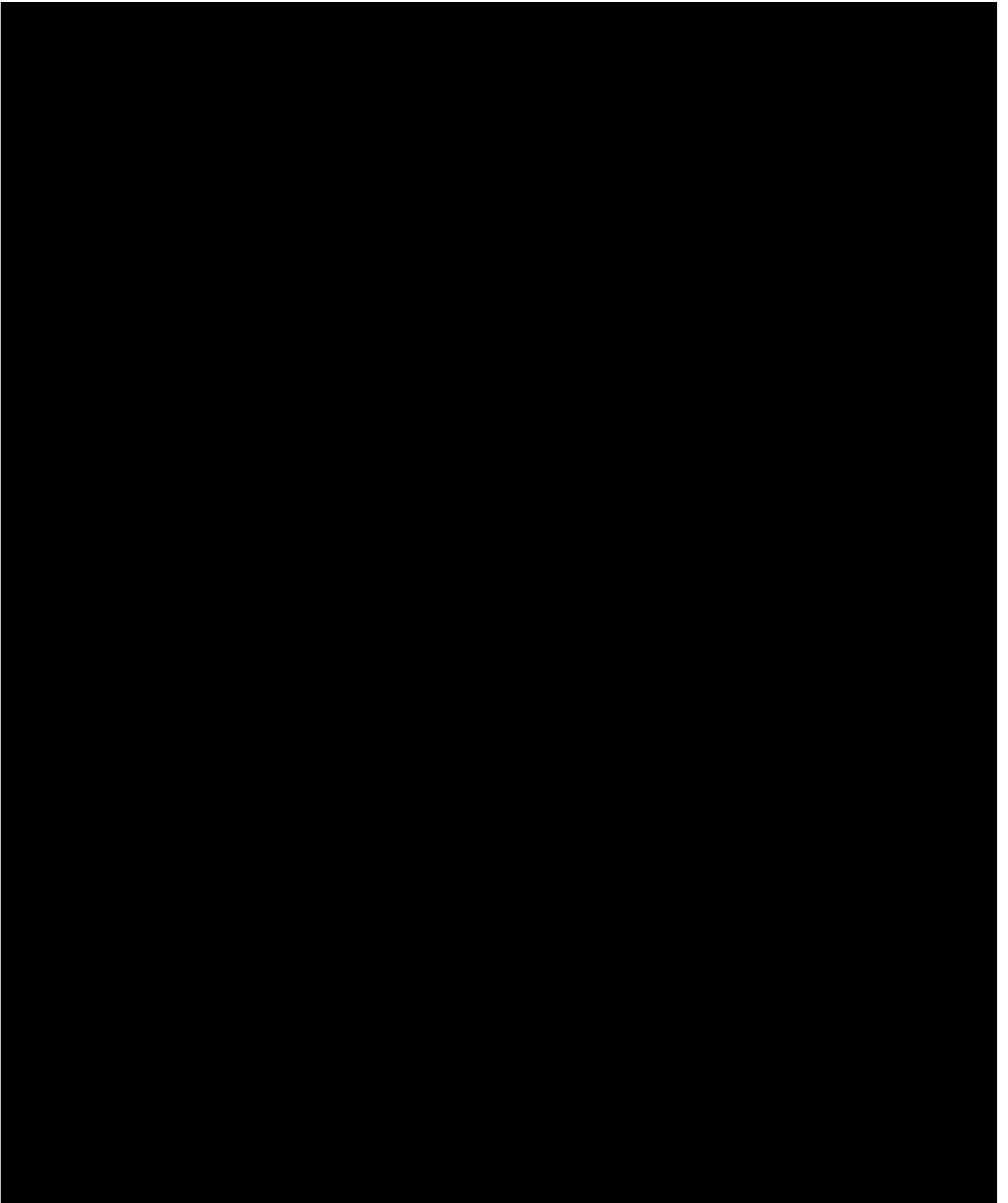
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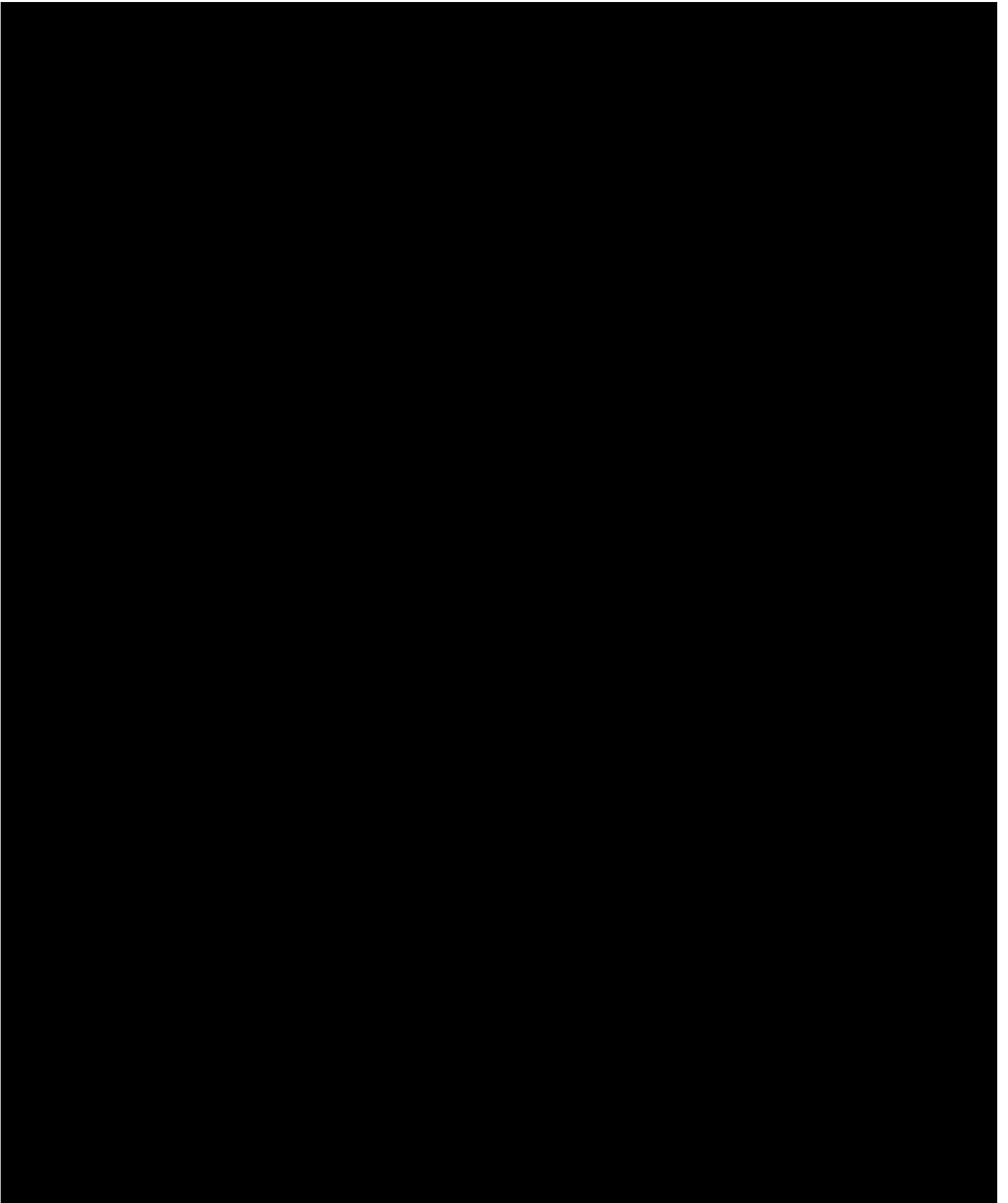
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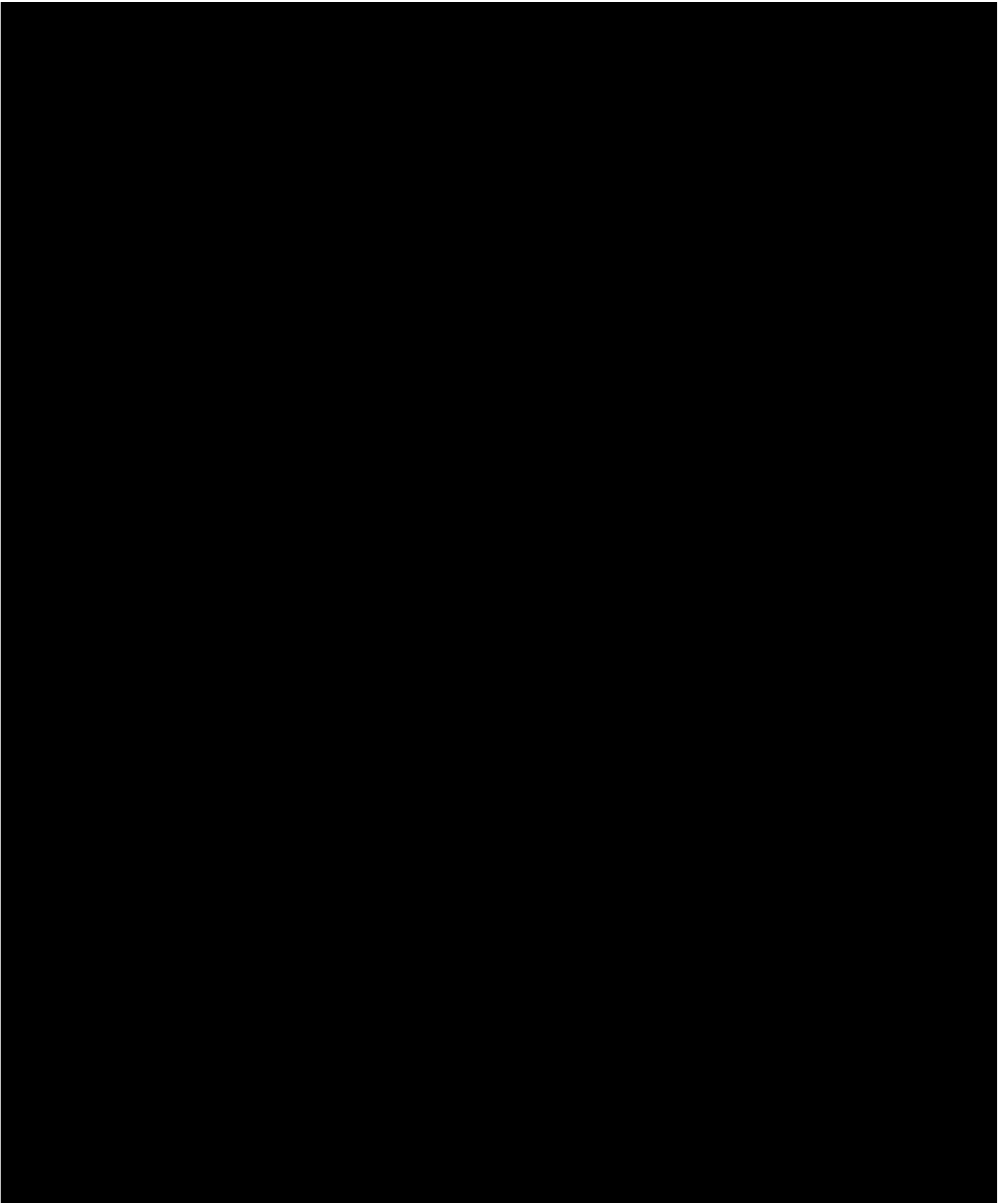
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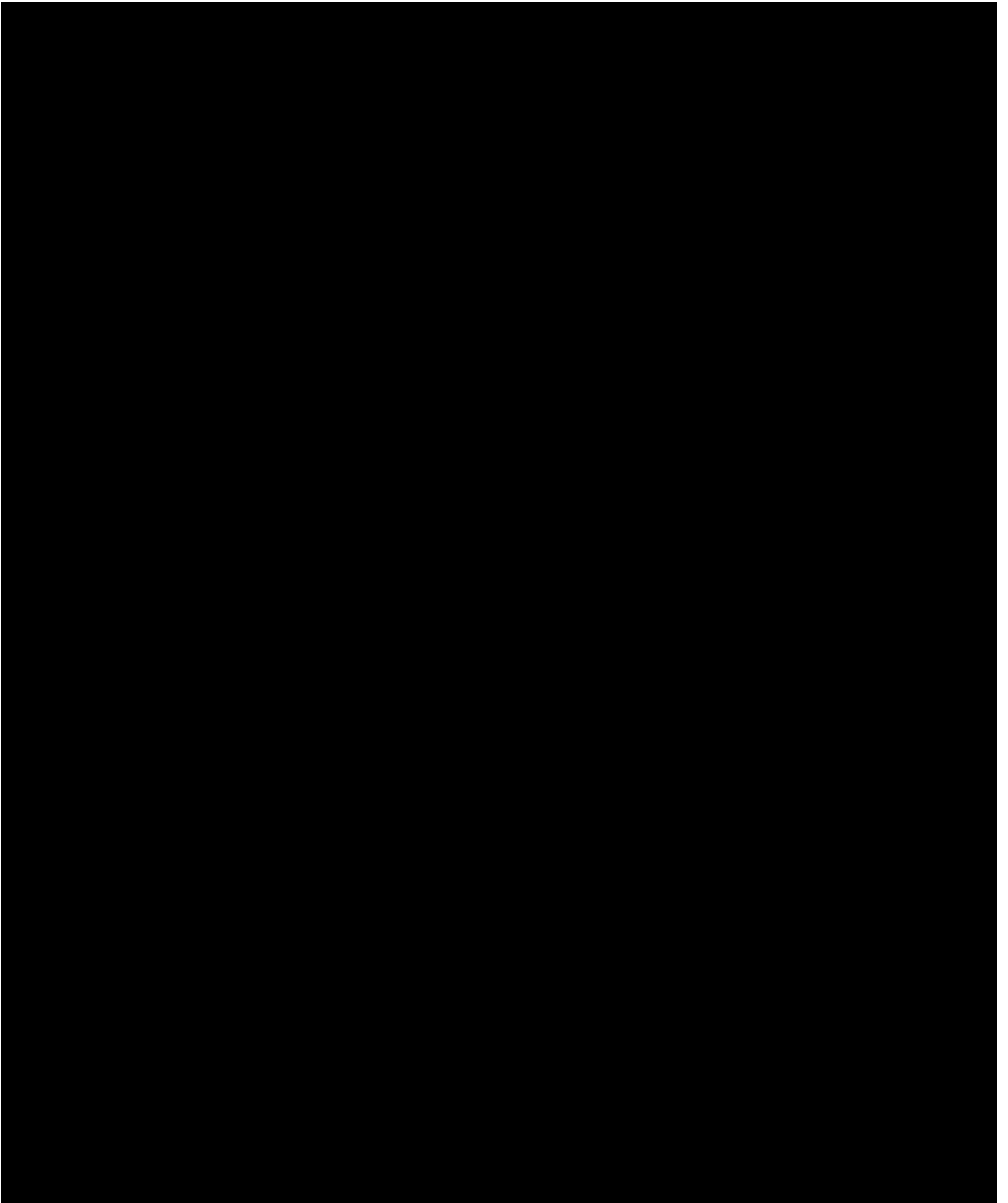


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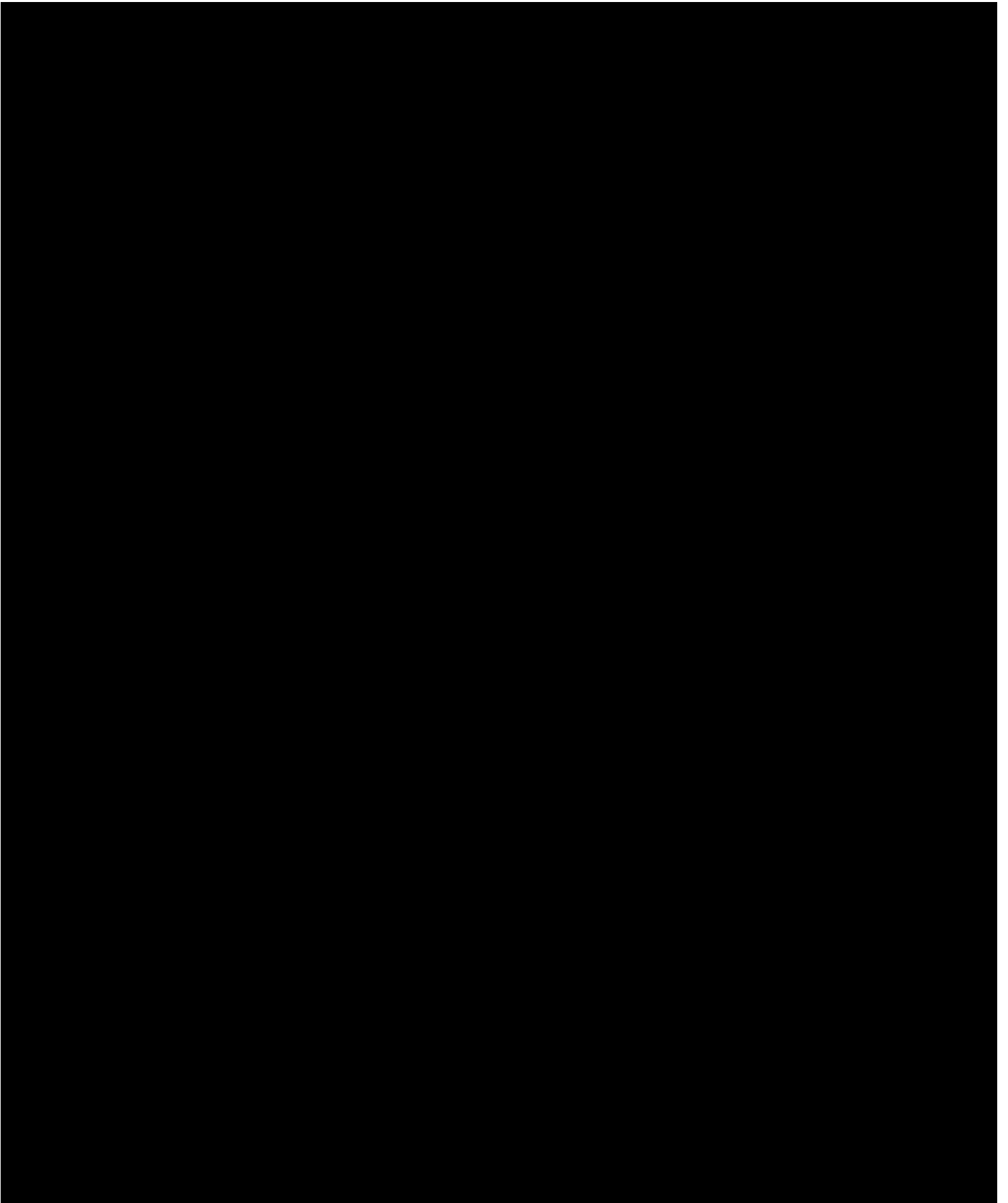




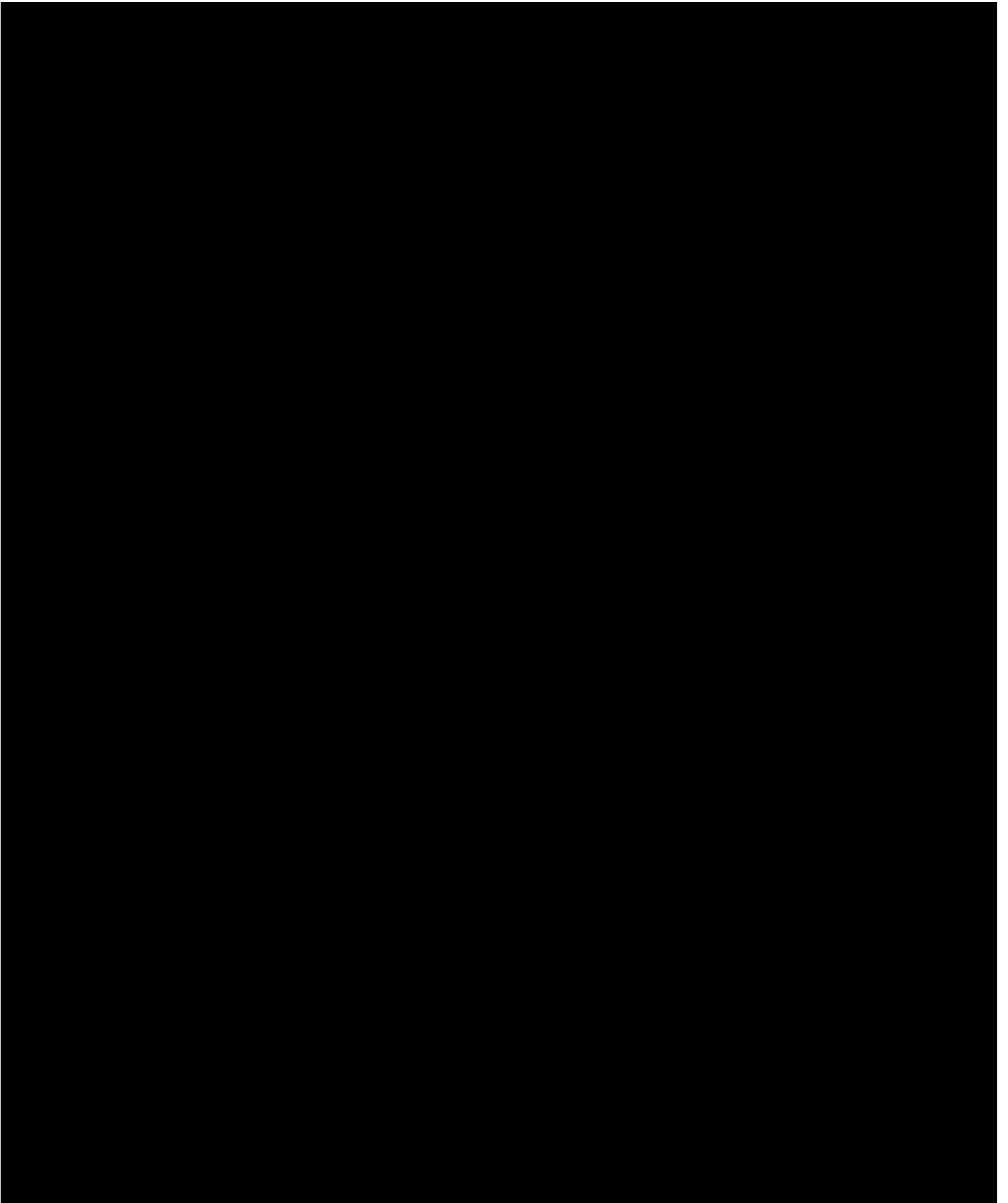
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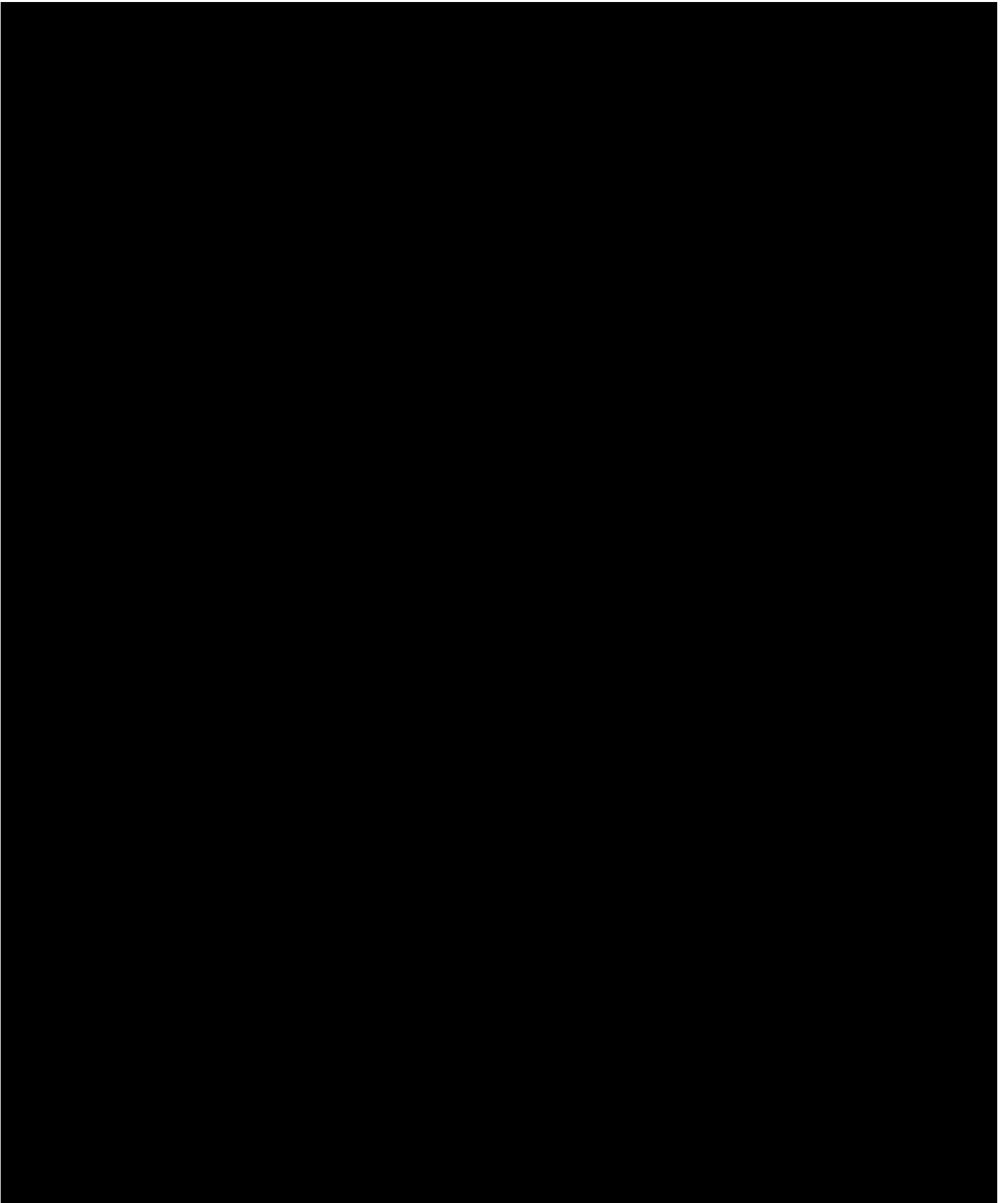
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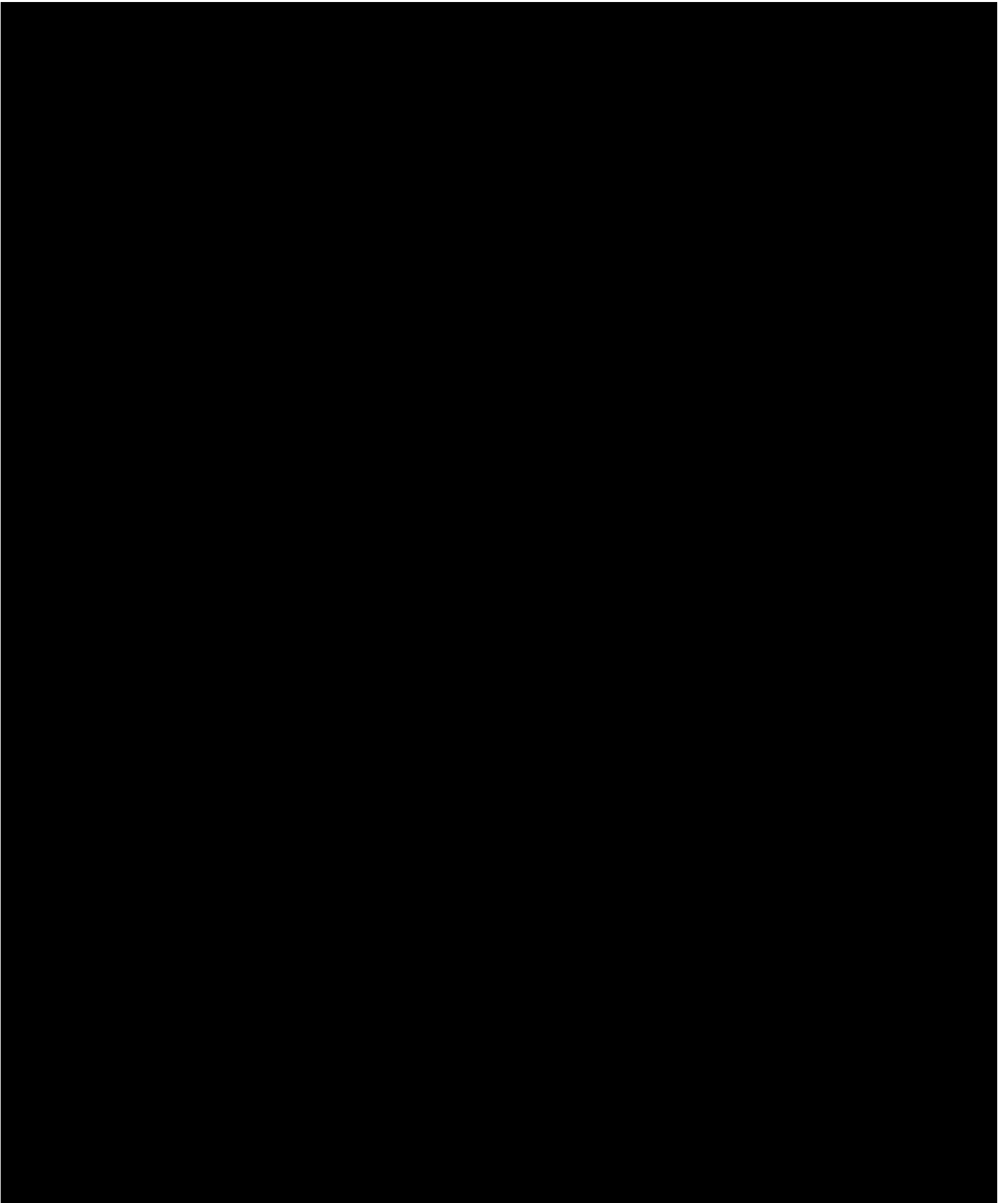
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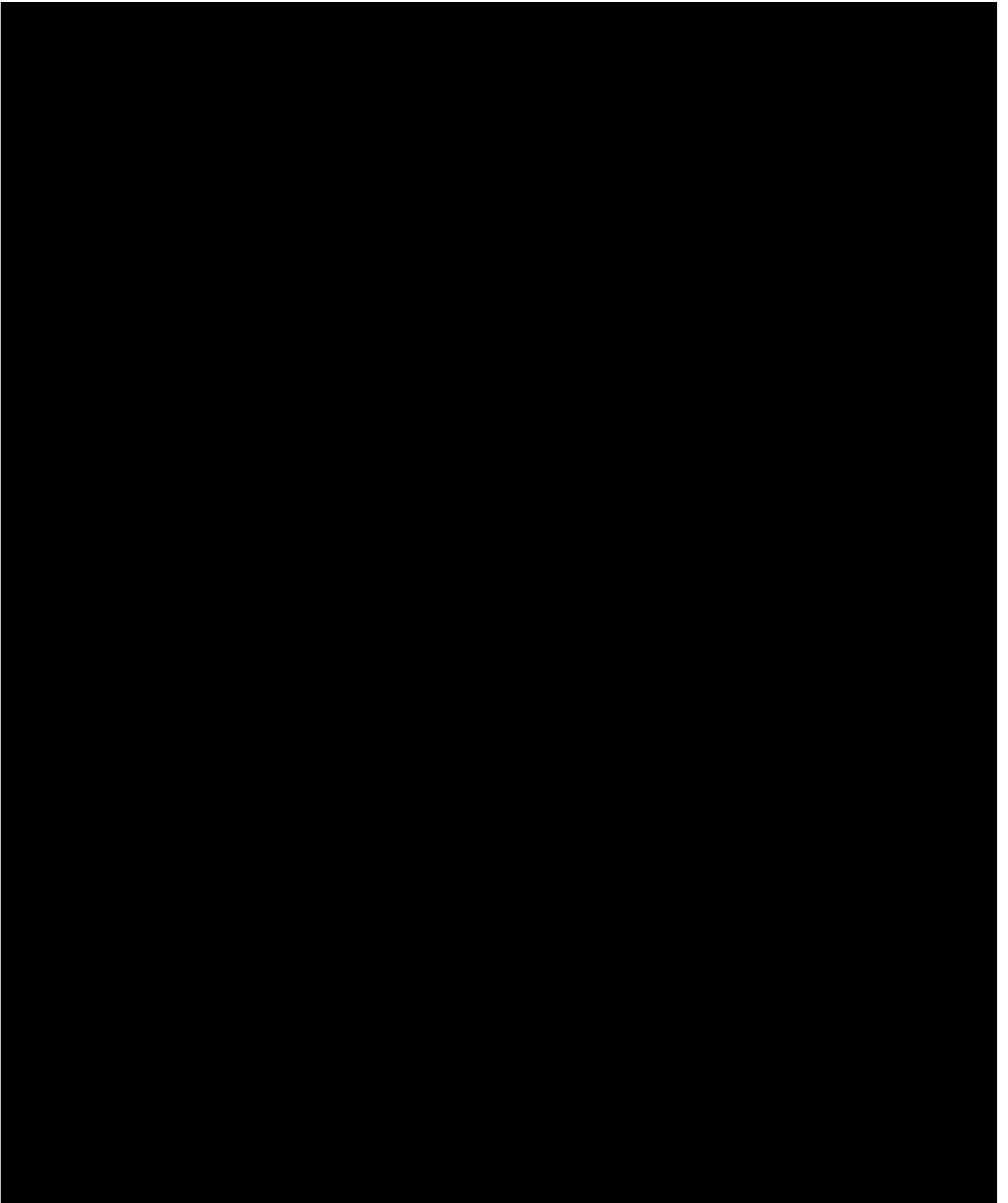
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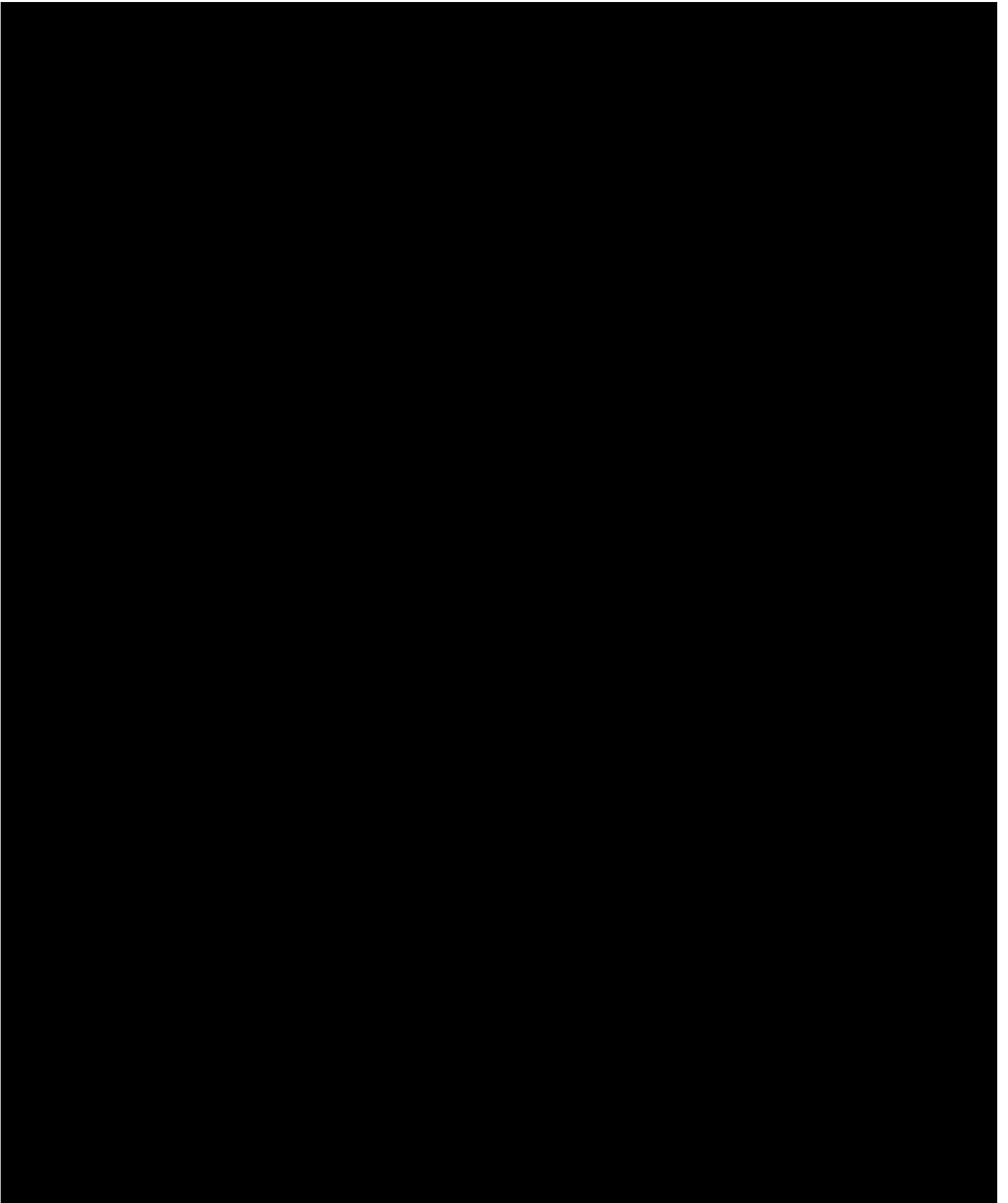
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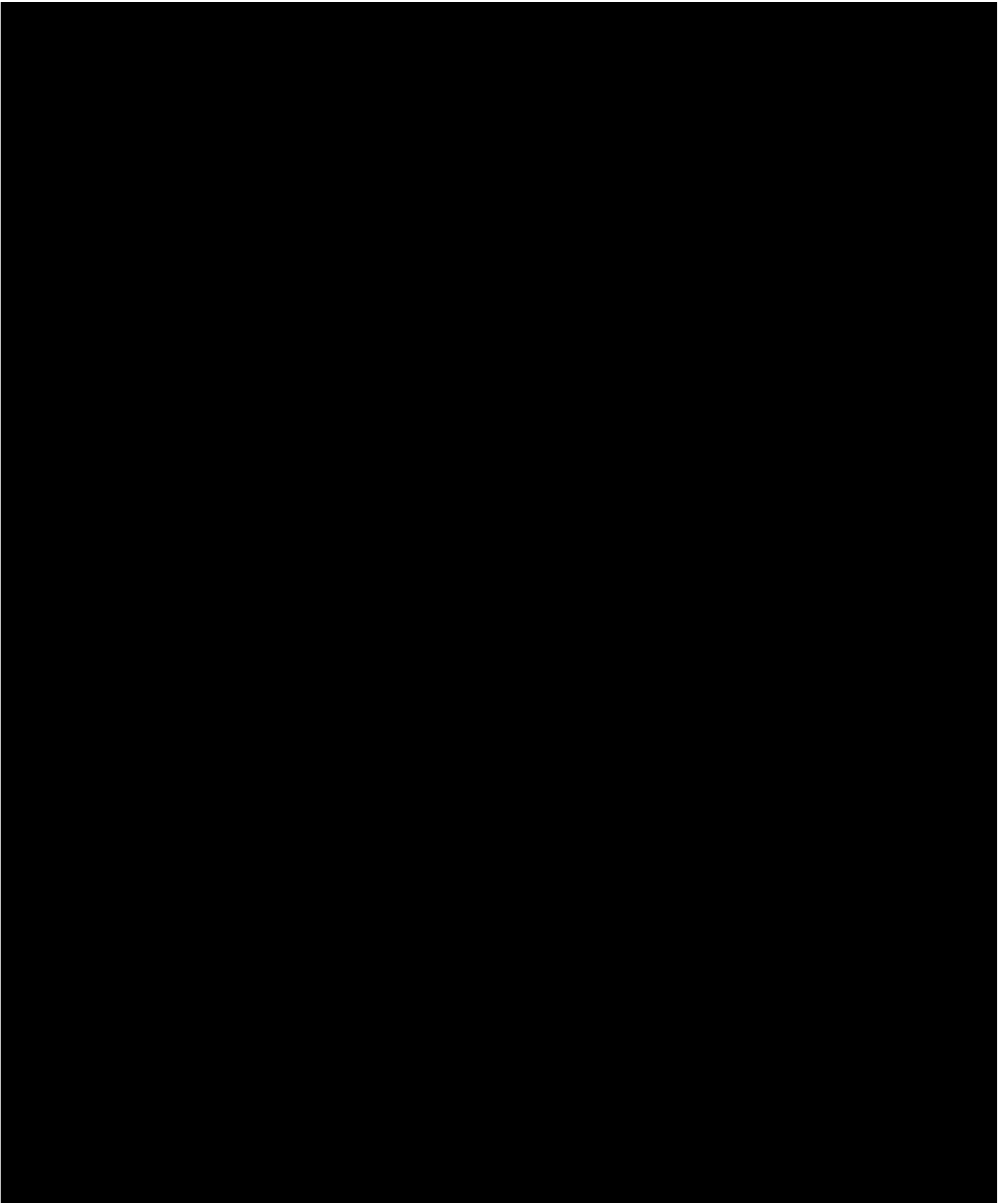
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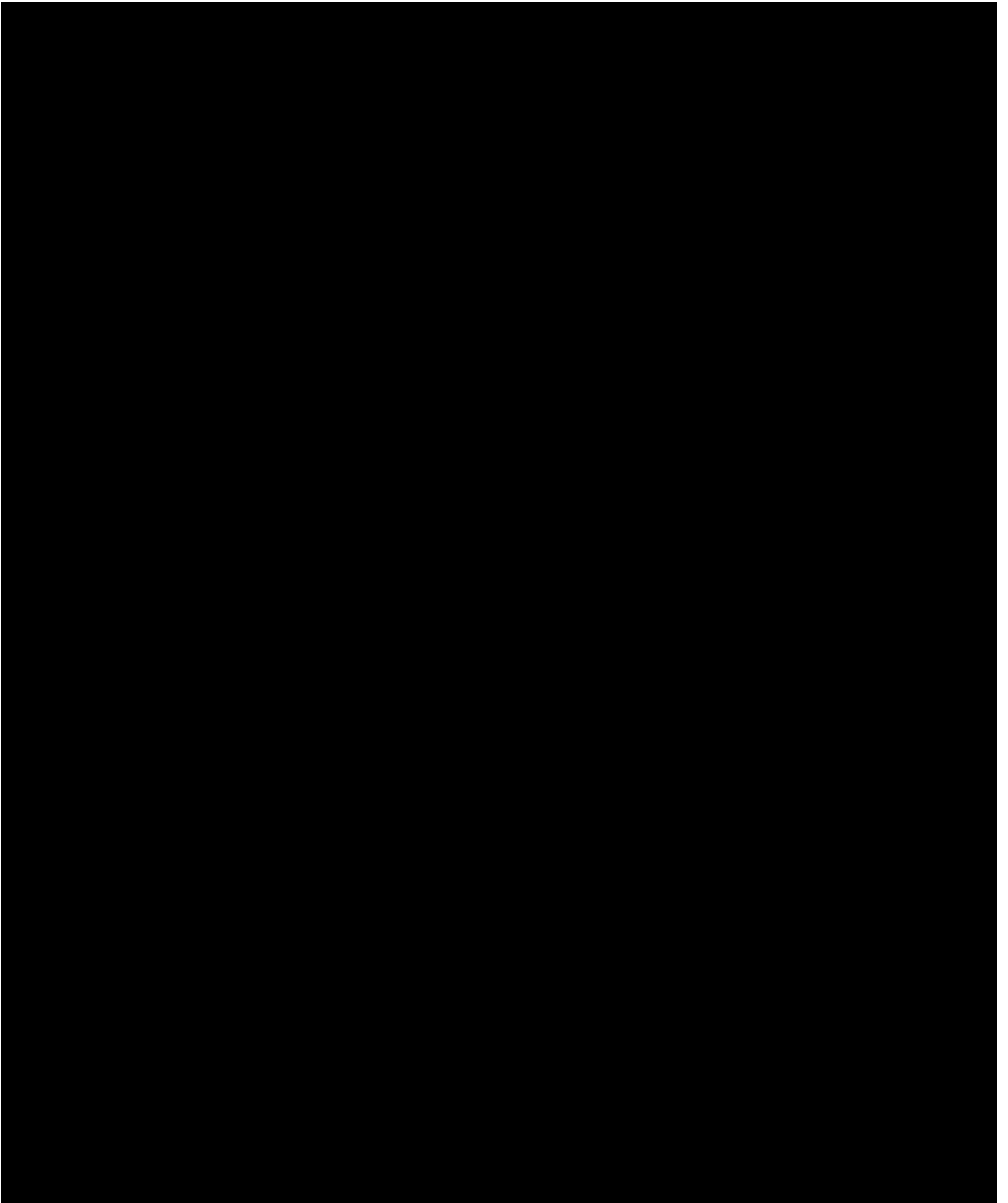


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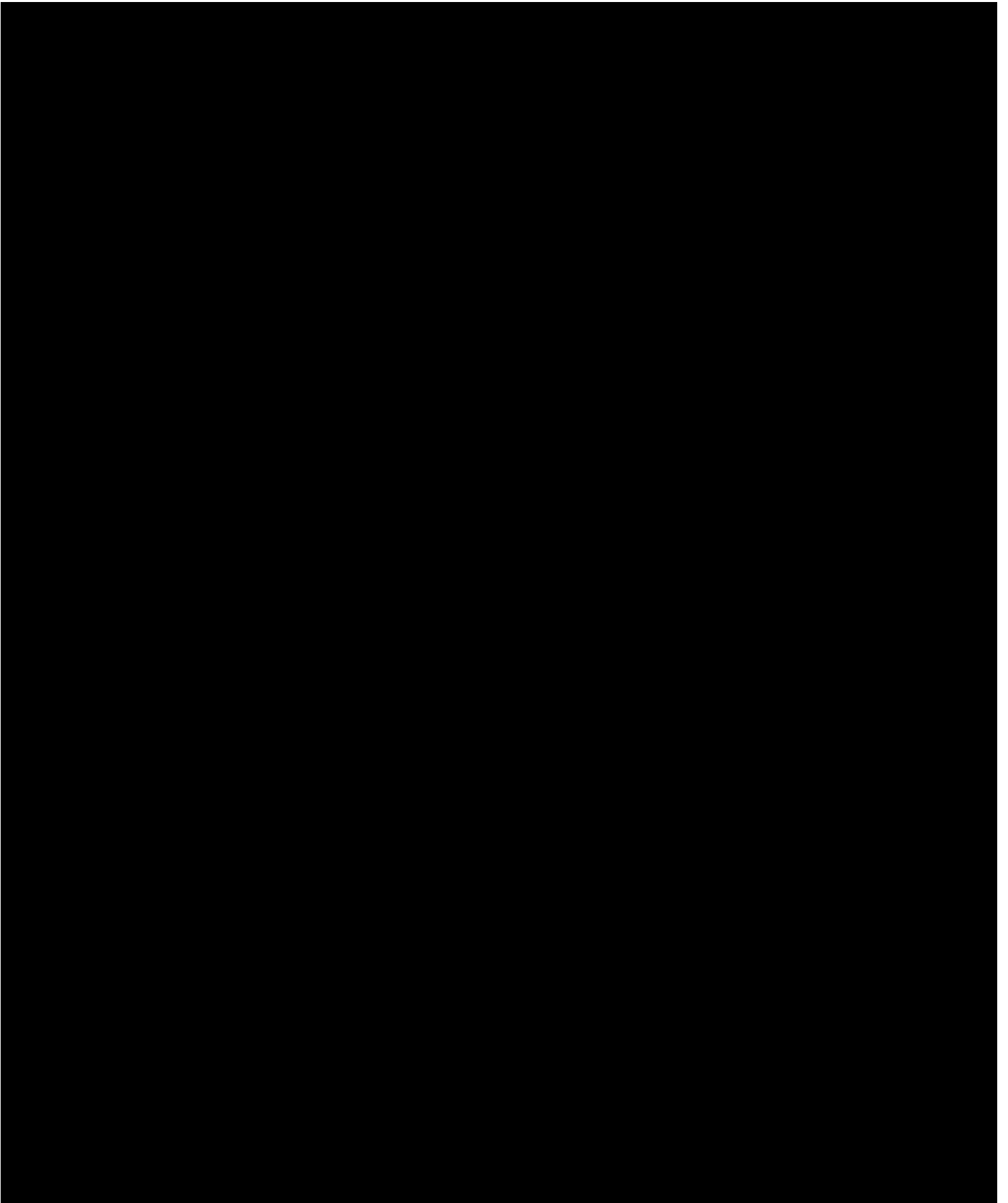




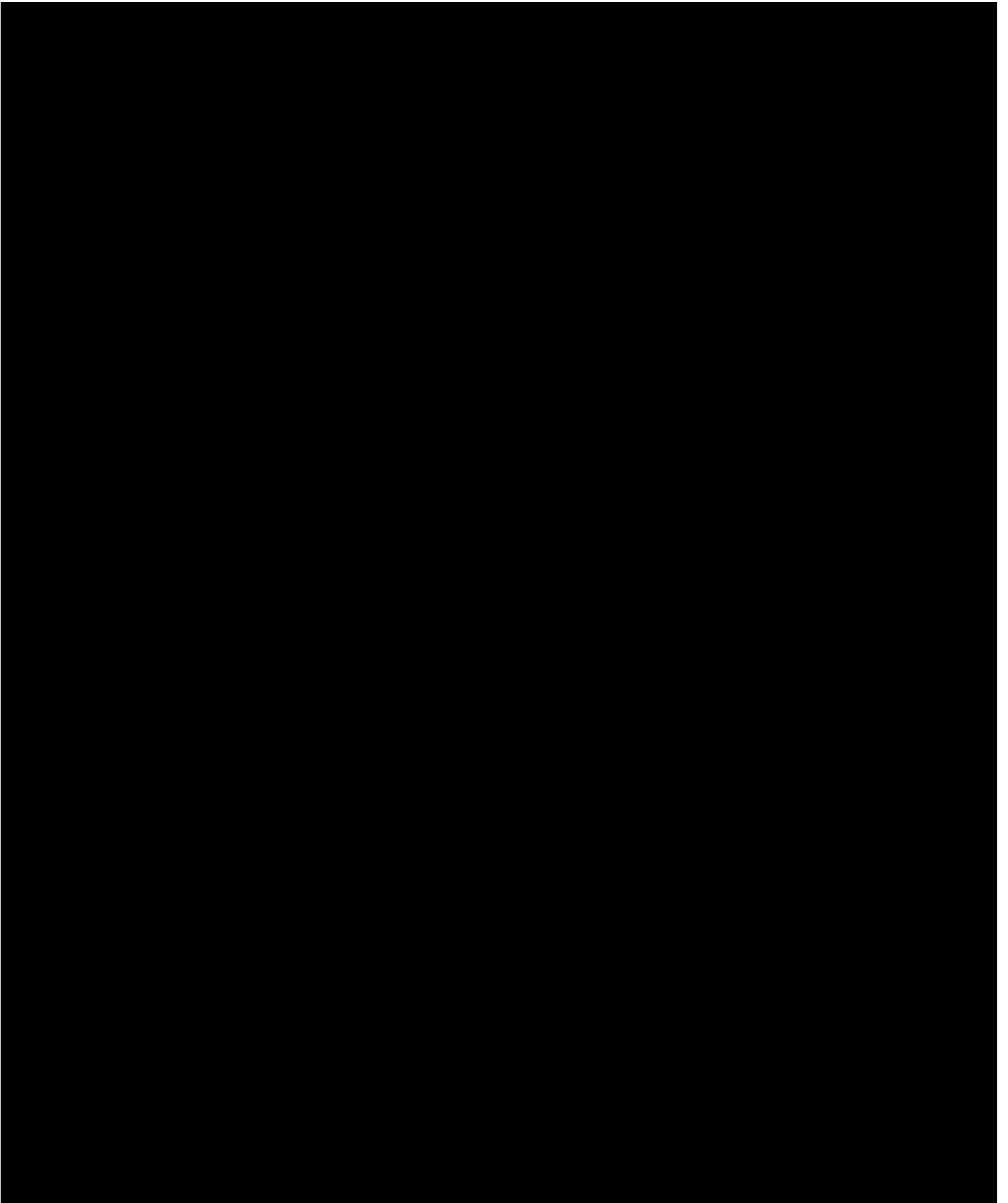
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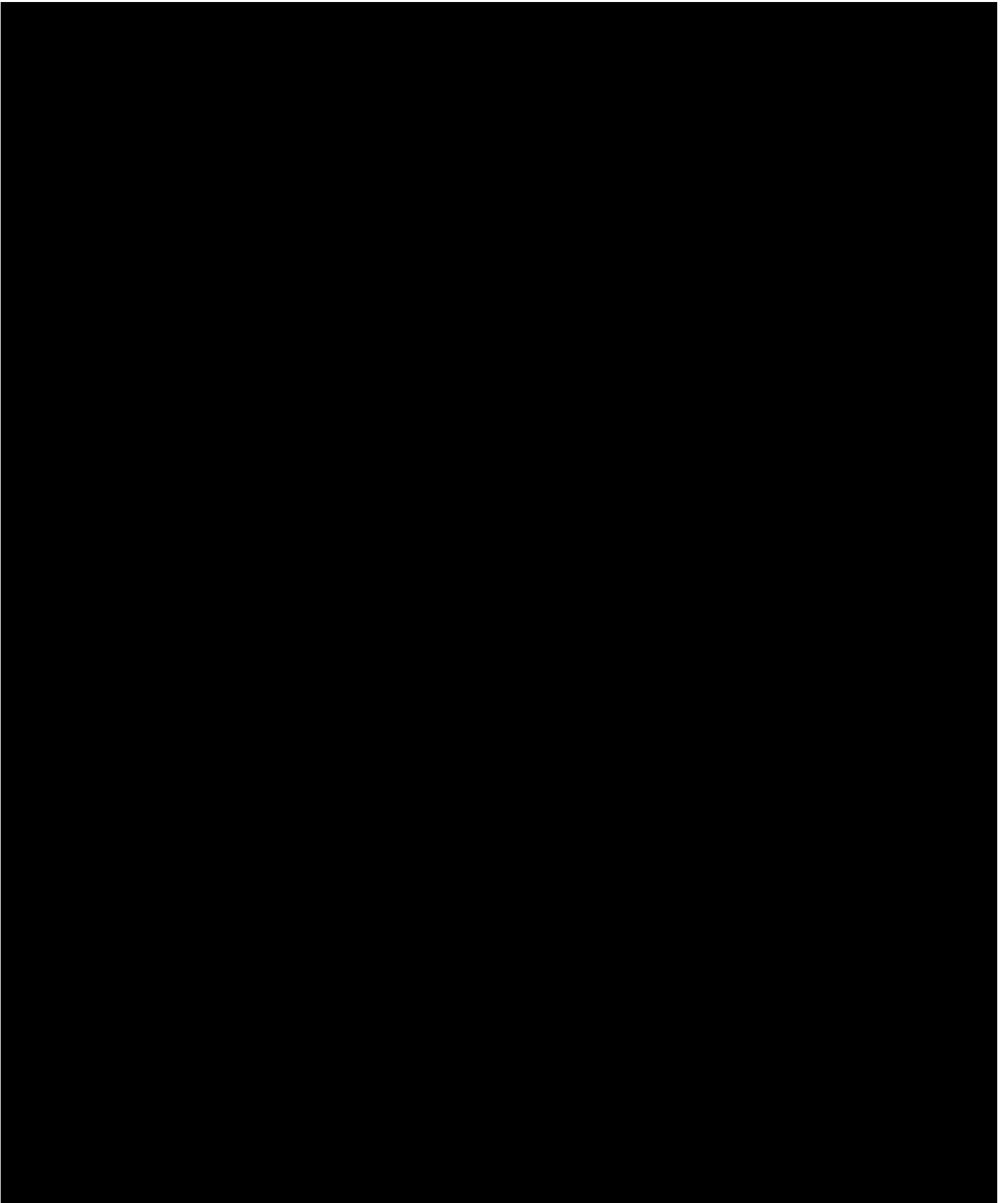
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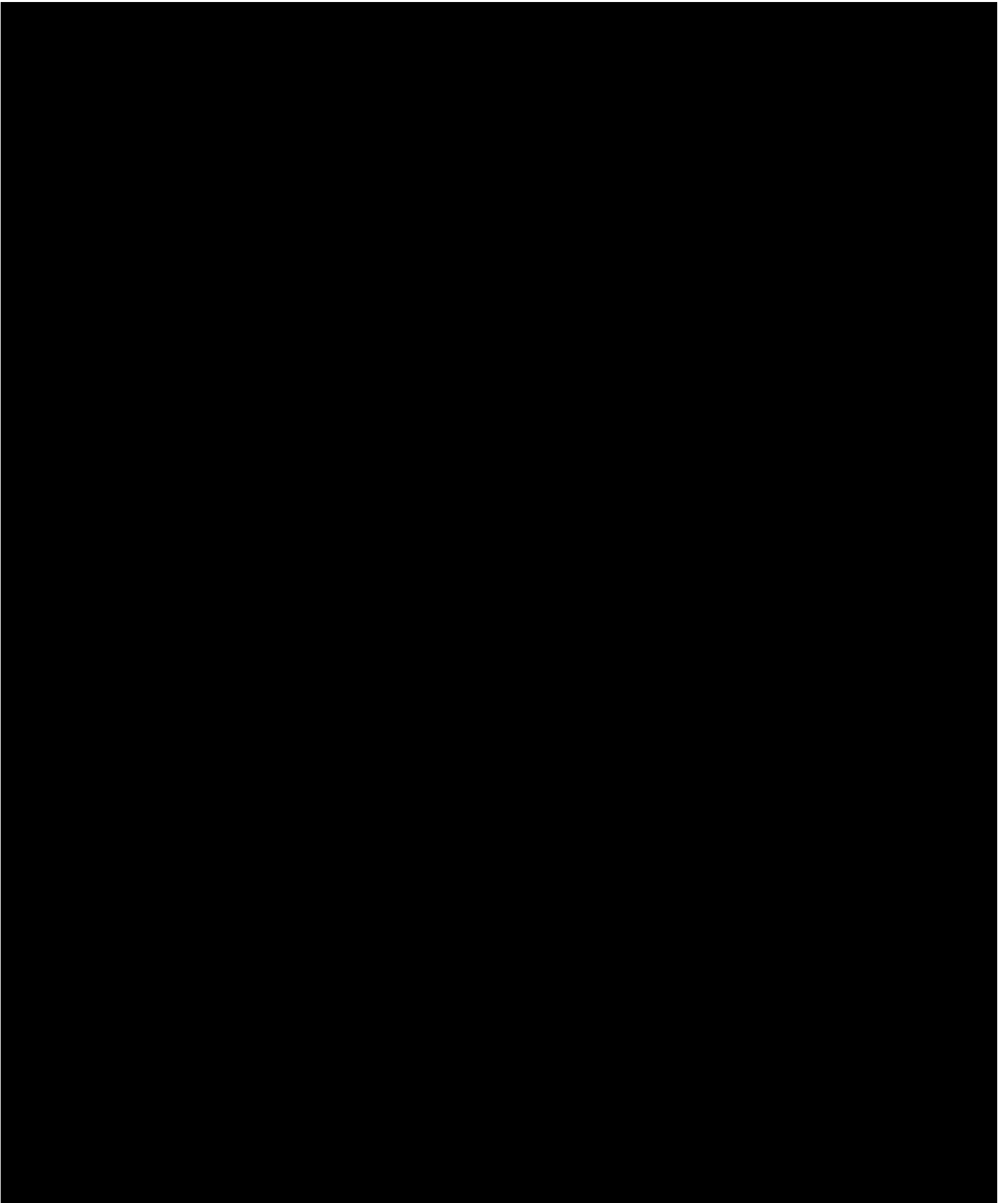
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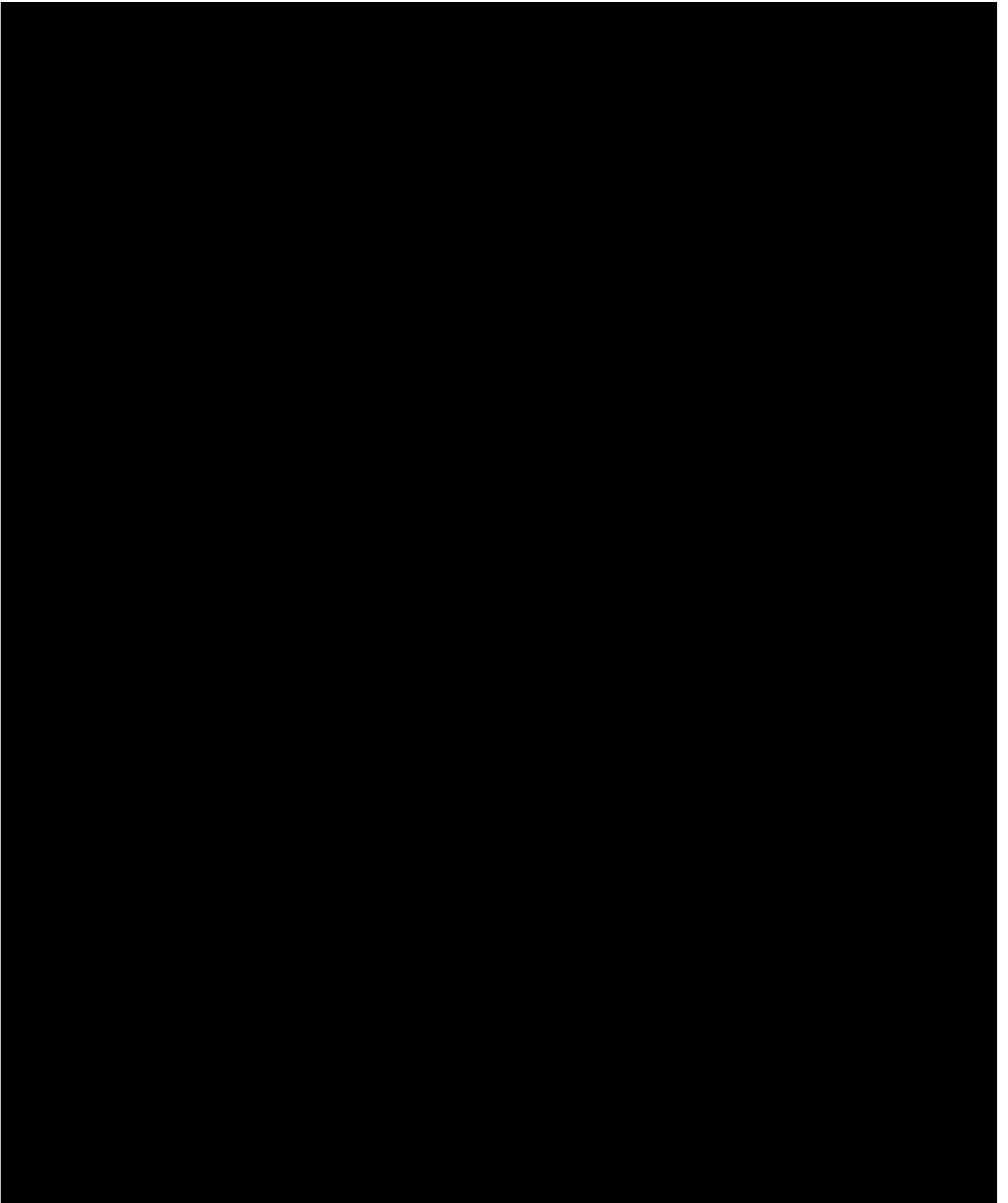
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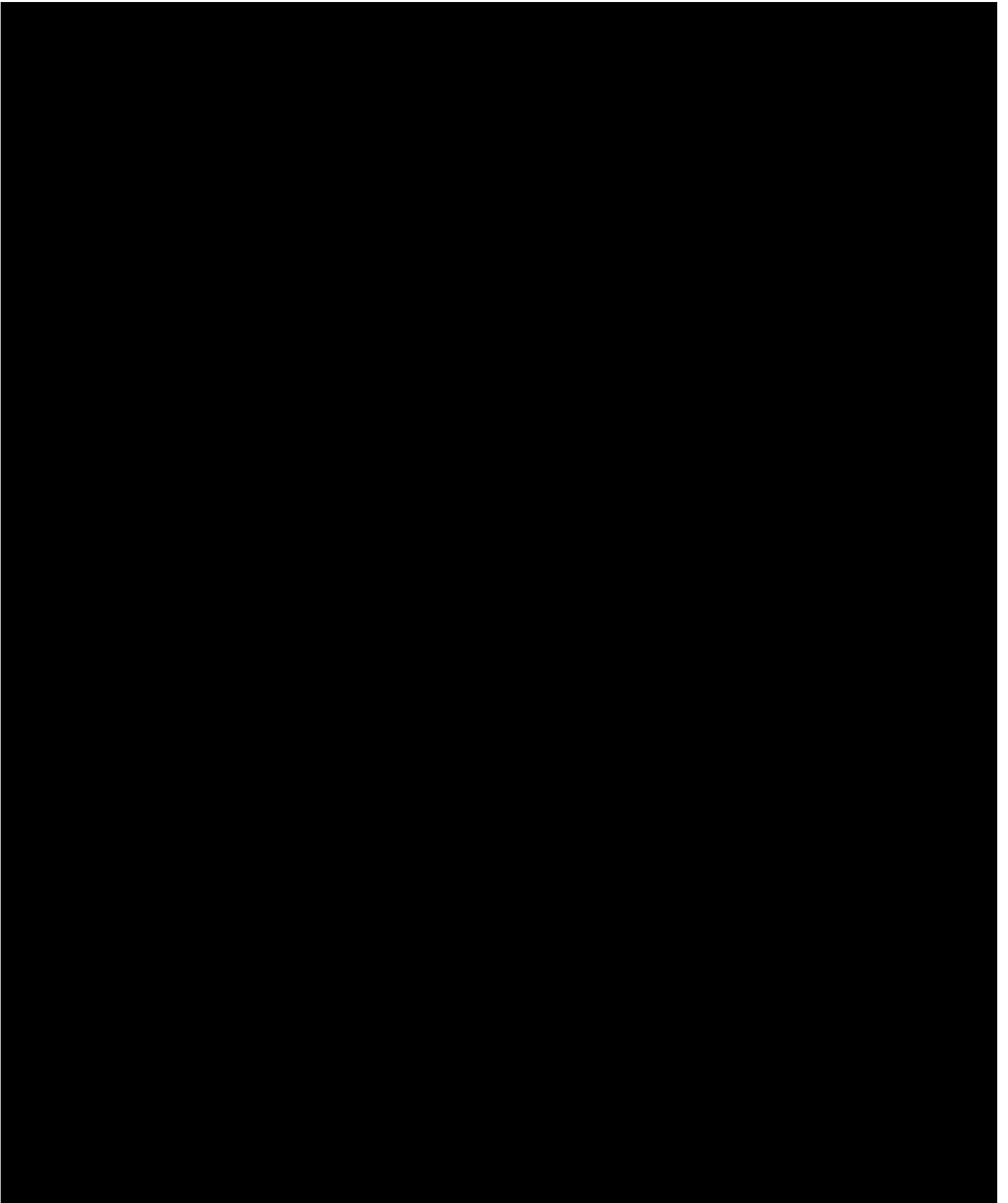
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# **EXHIBIT 32**



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CORPORATION,

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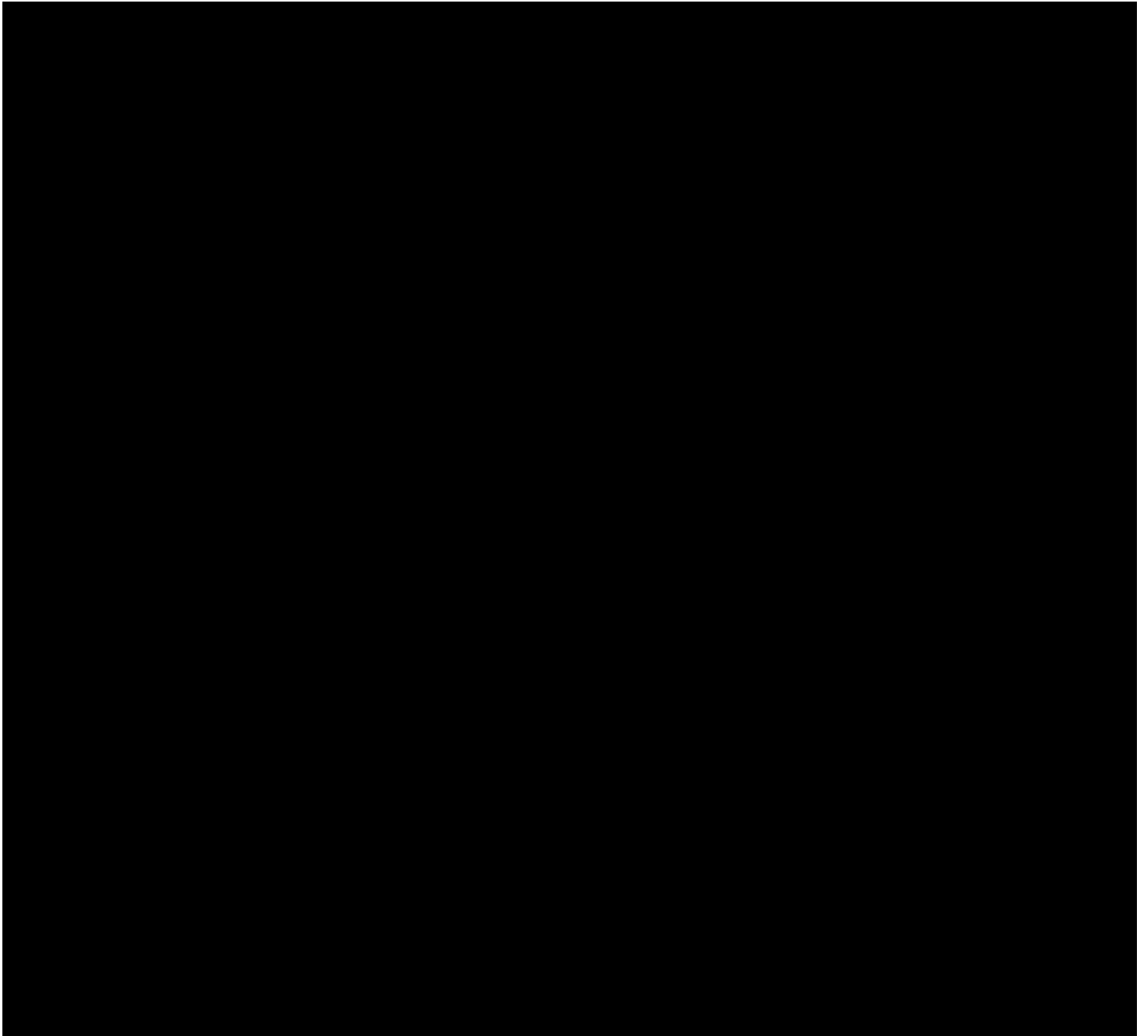
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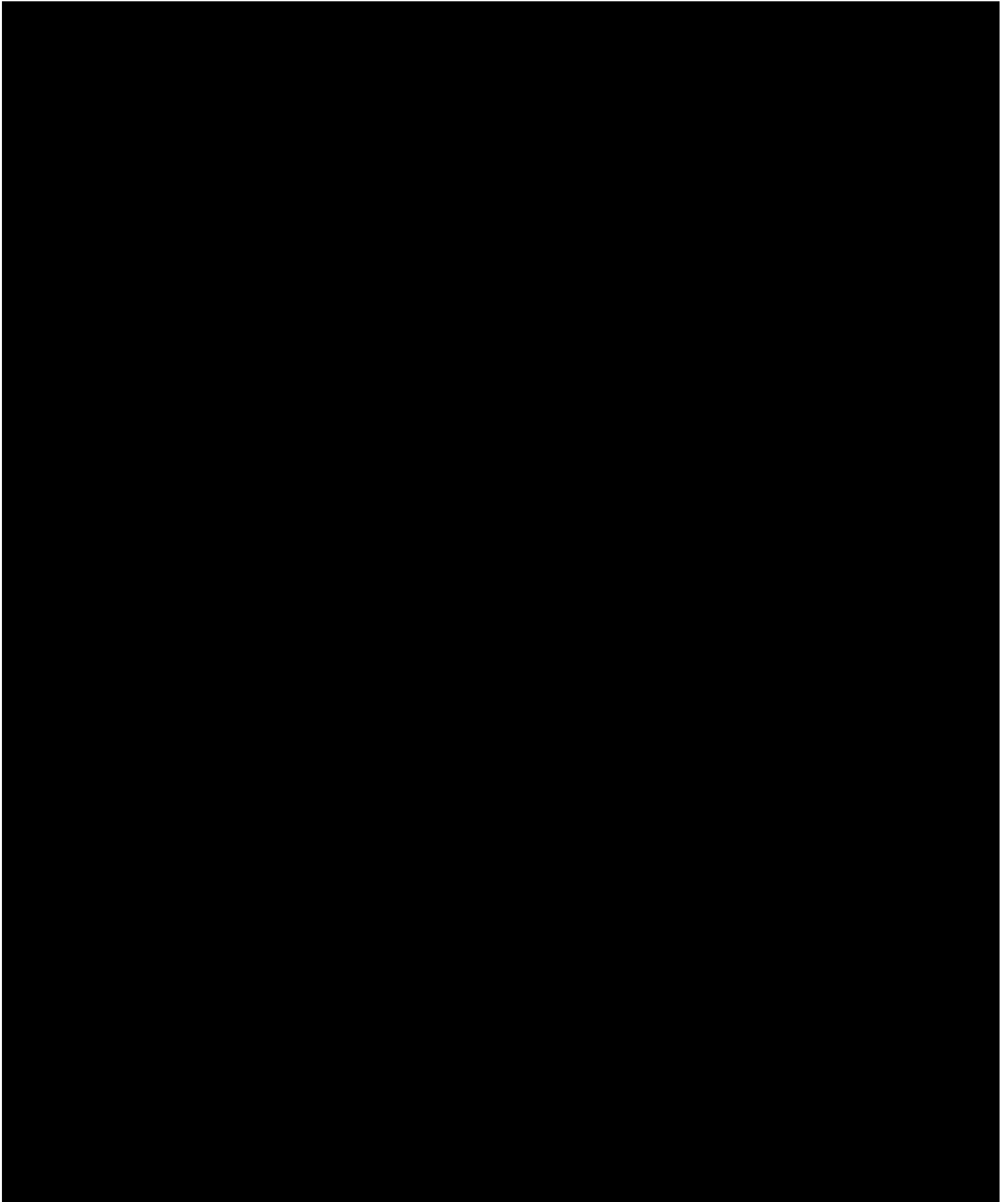
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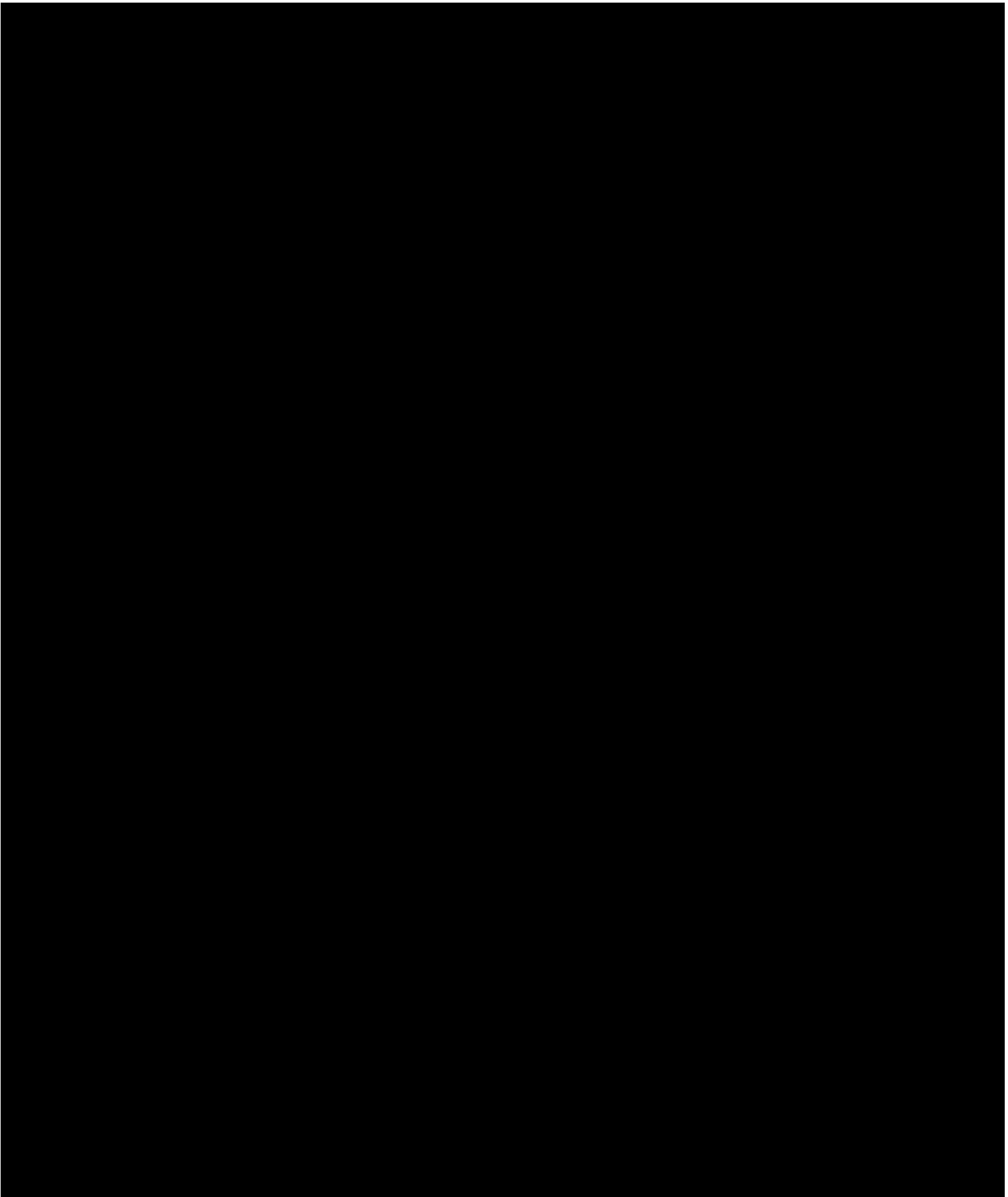
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DR. PETER W. MARTIN, J.D.**

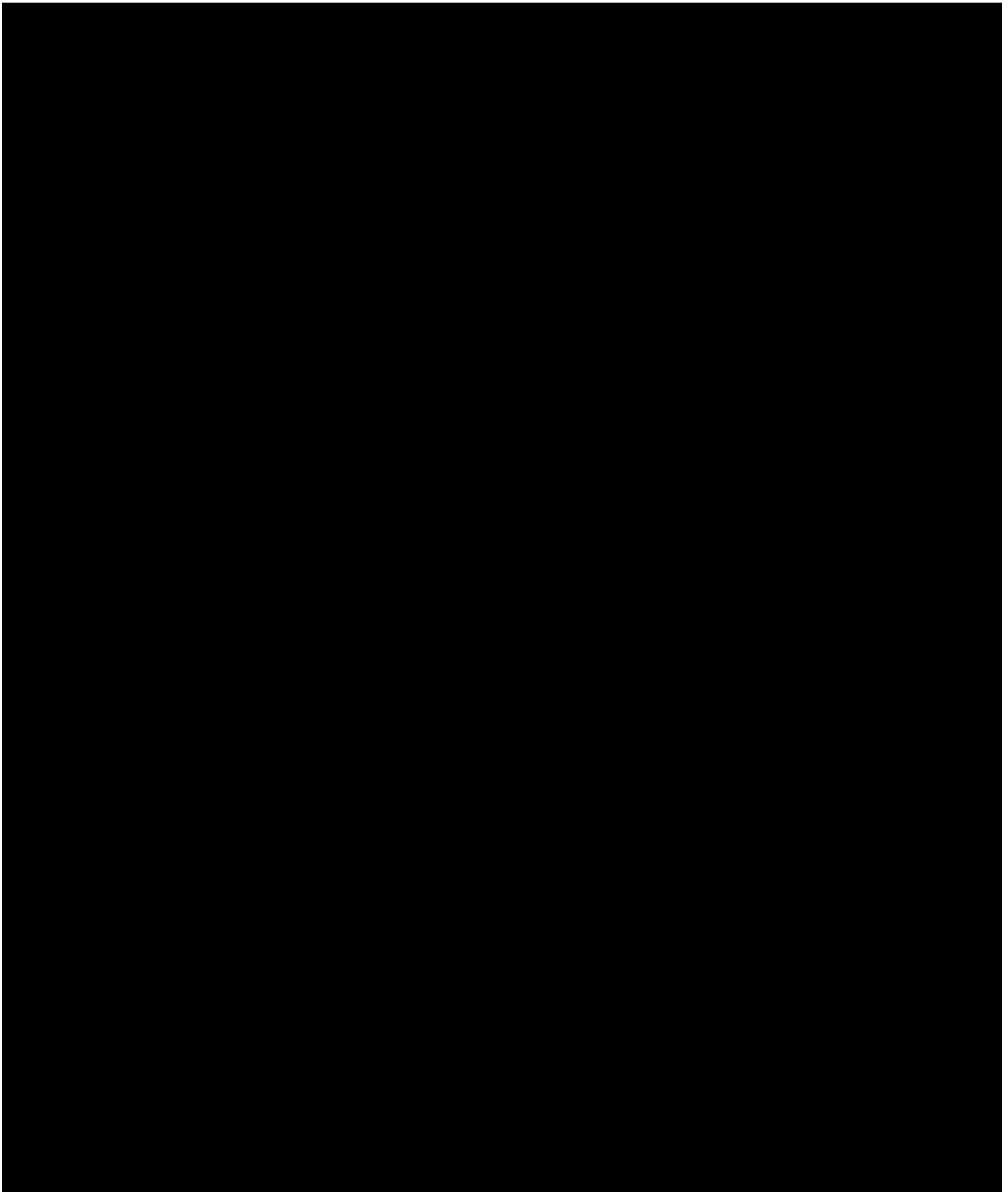
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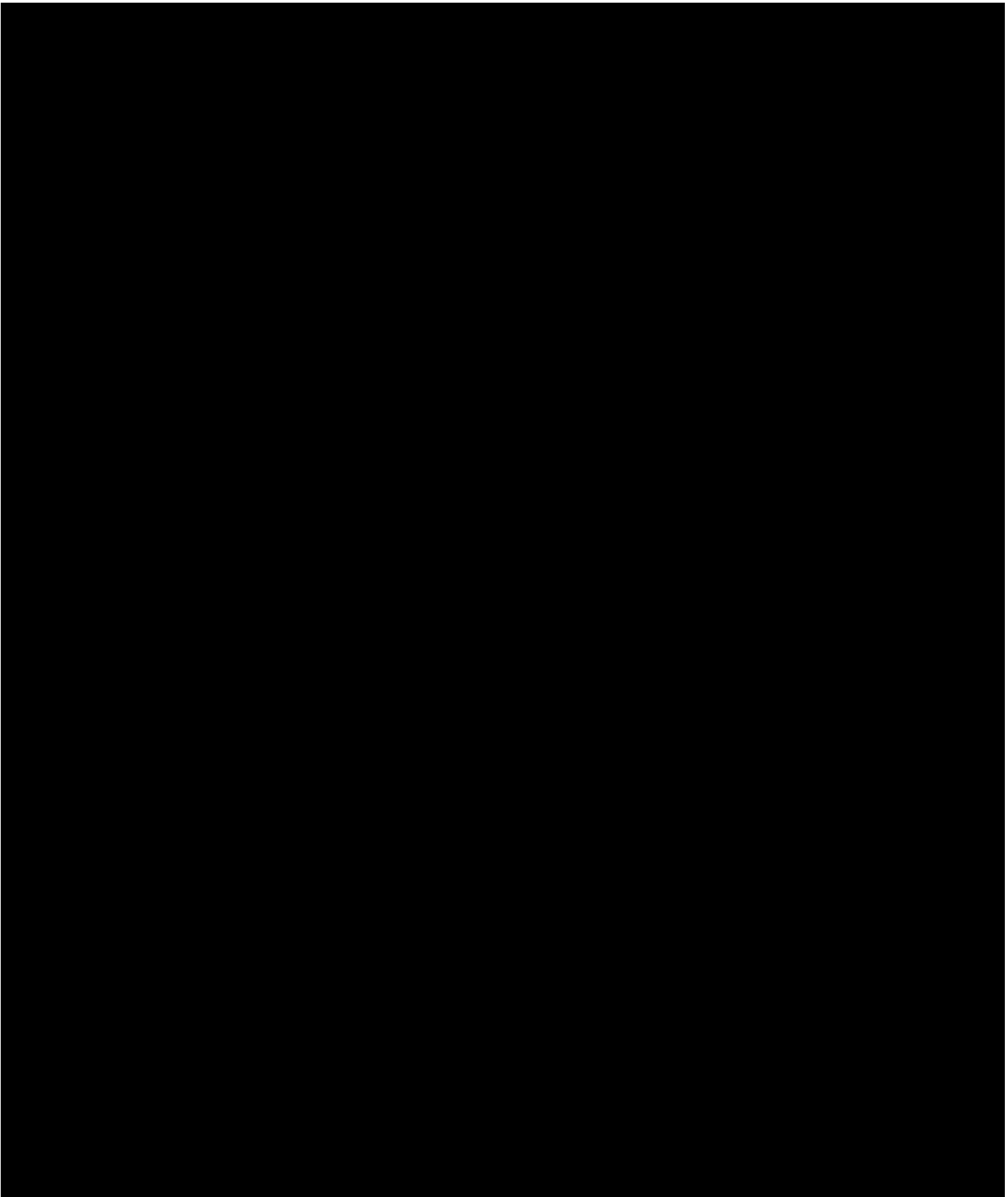
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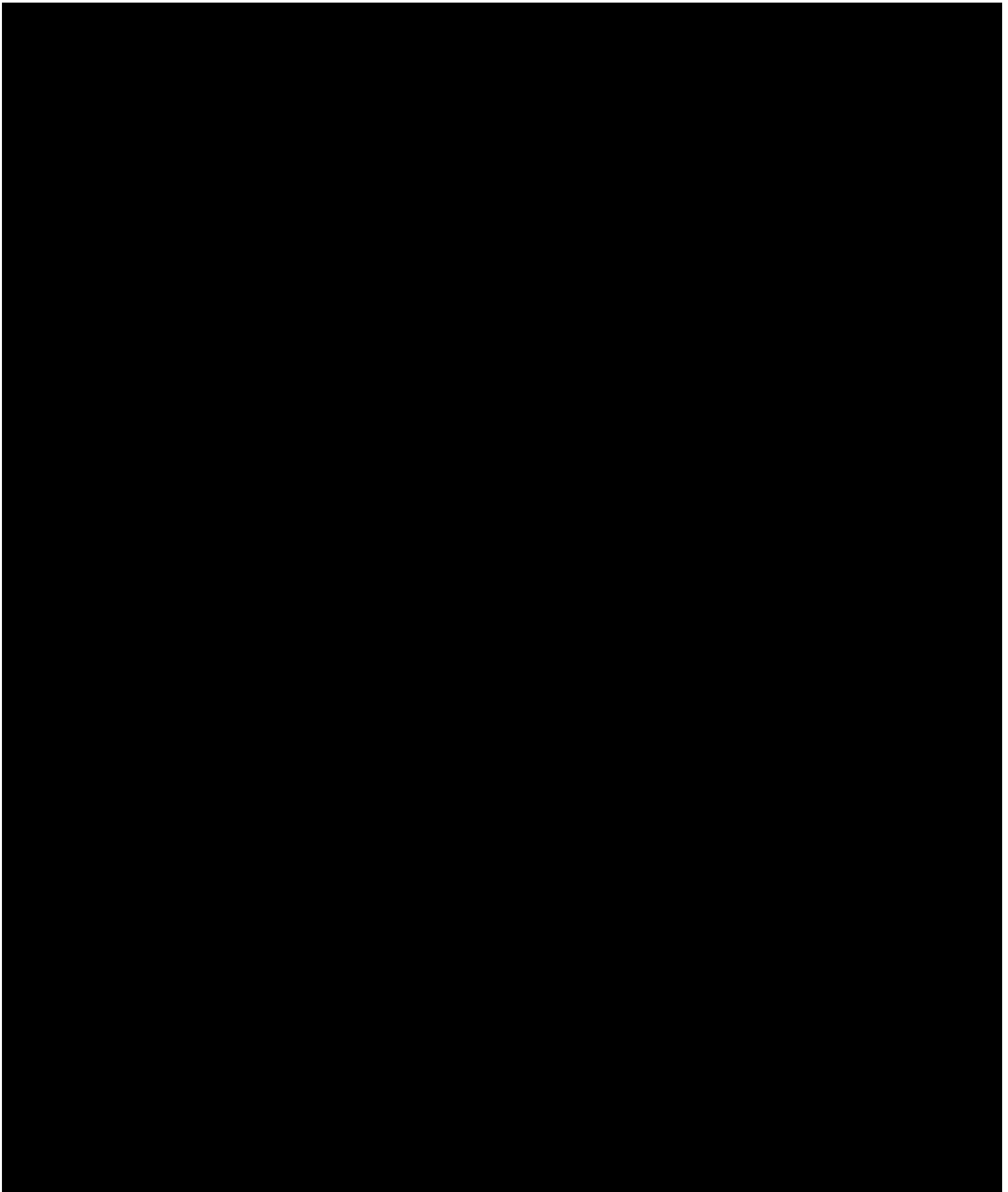


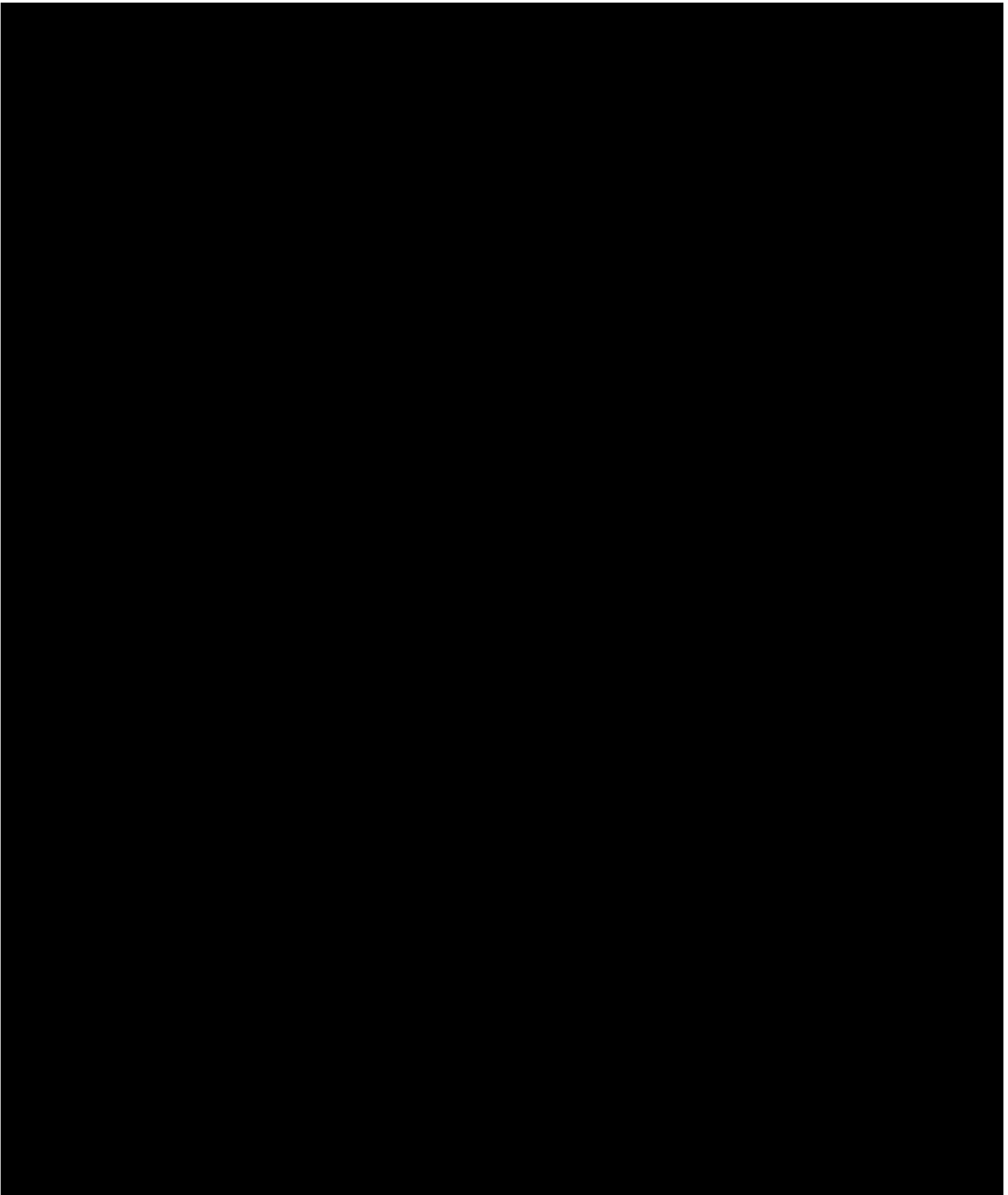




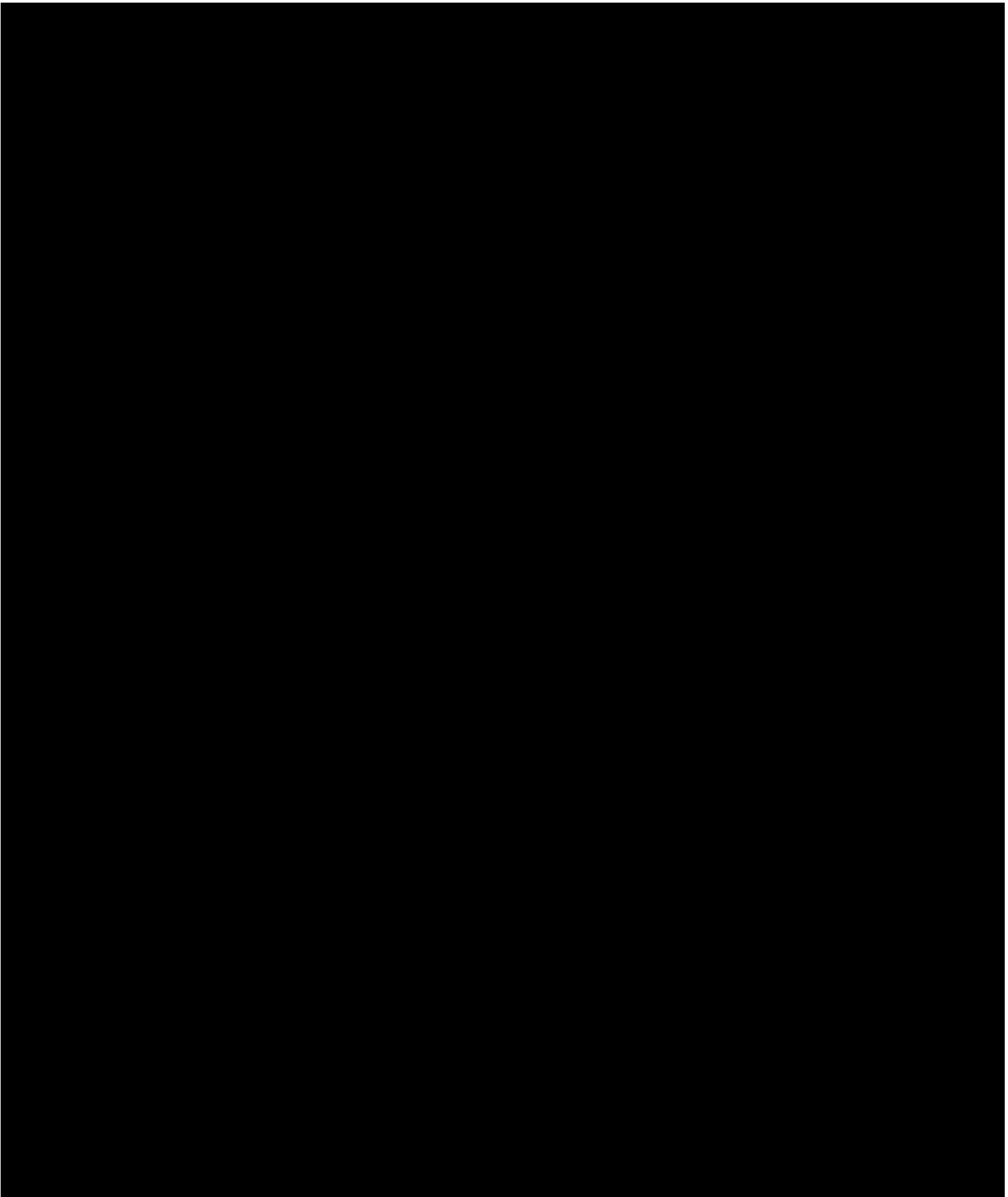


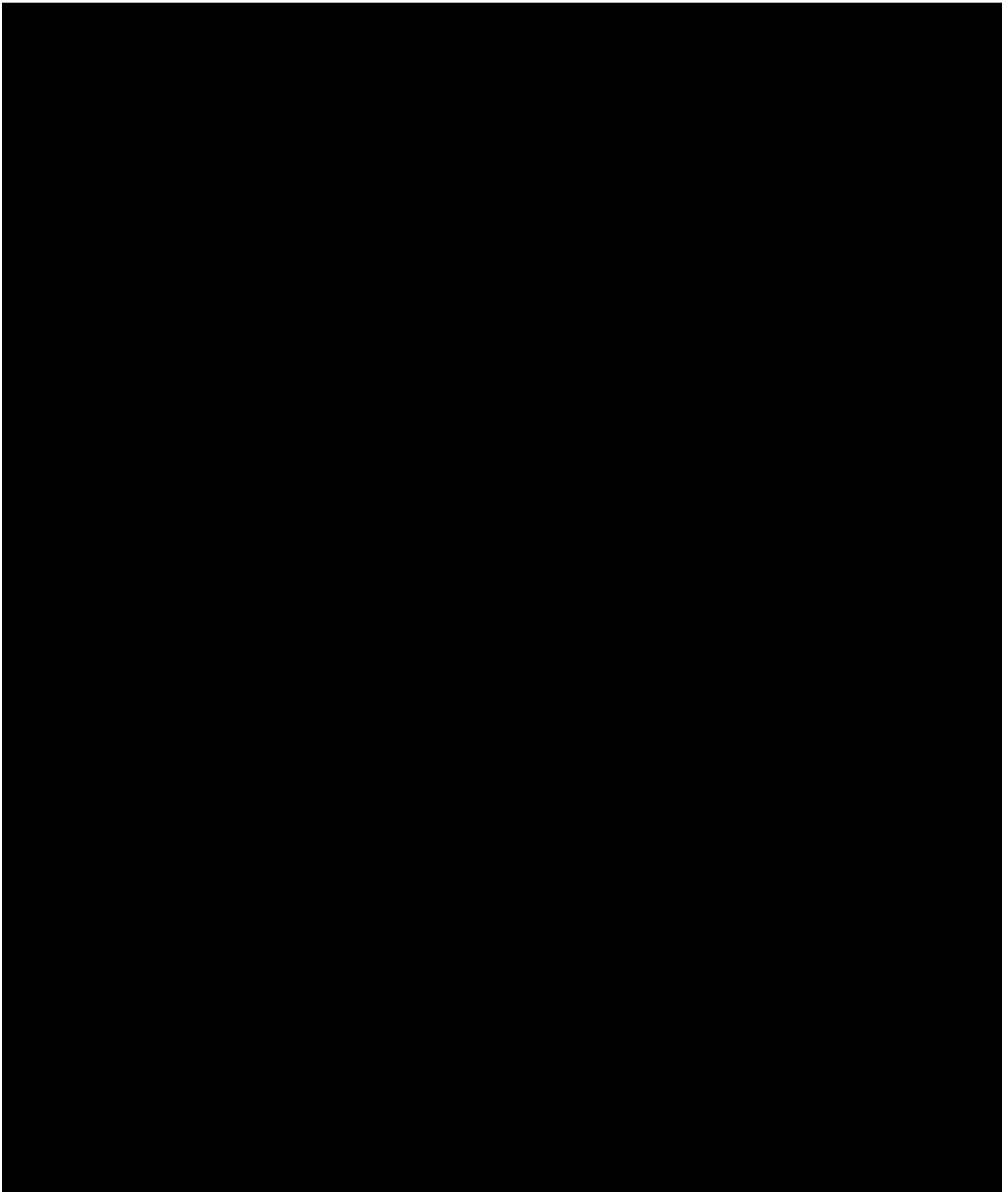


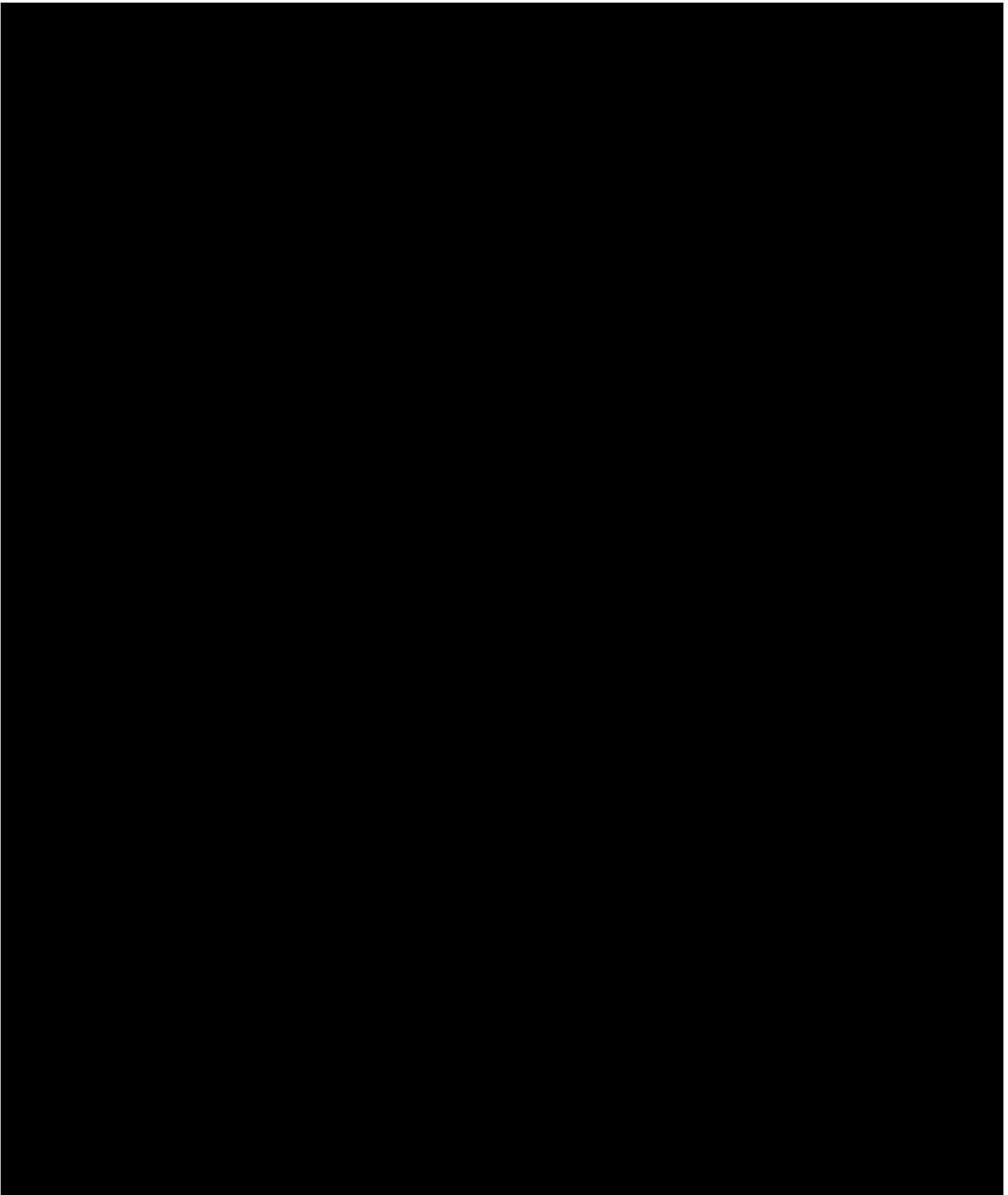


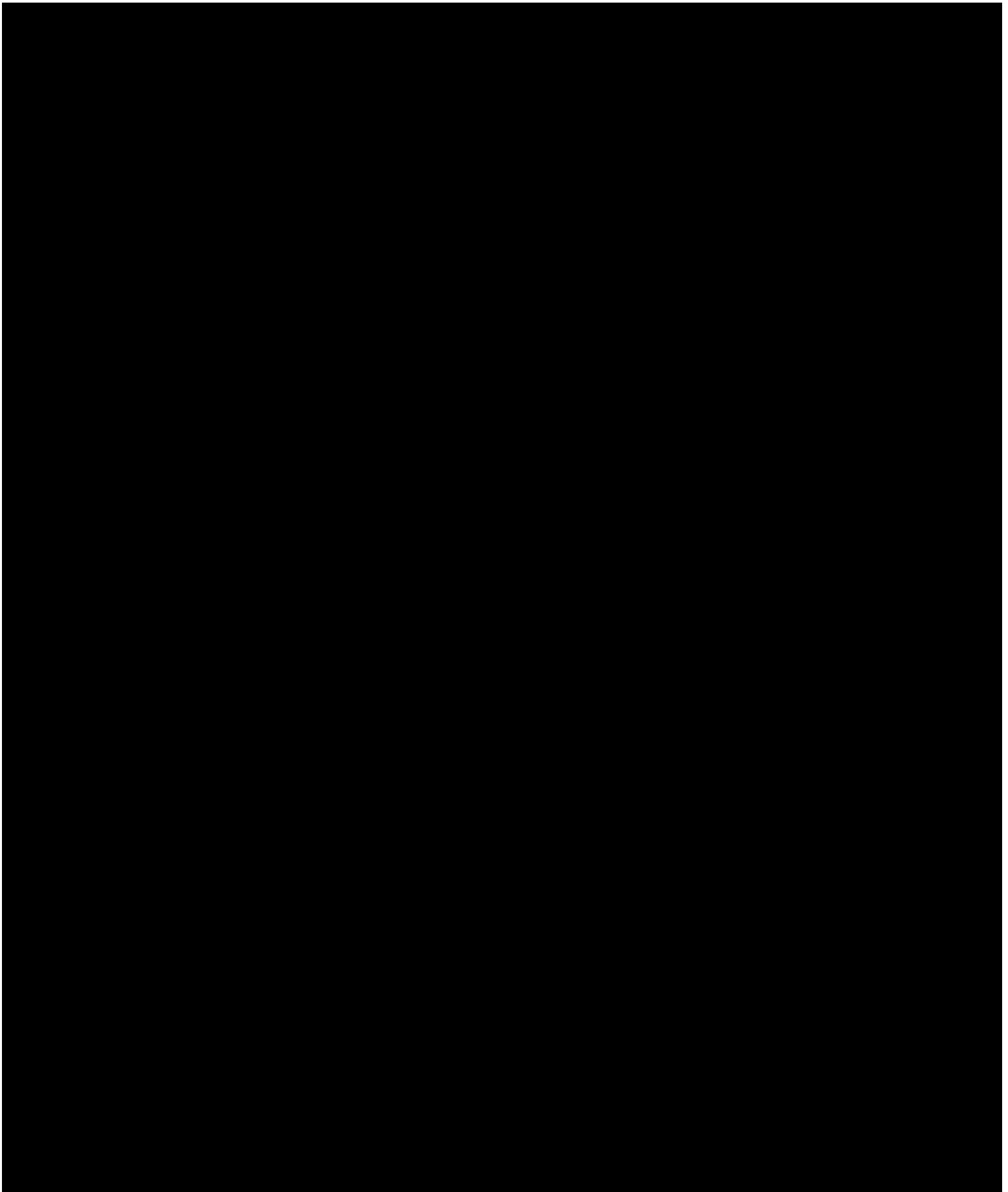


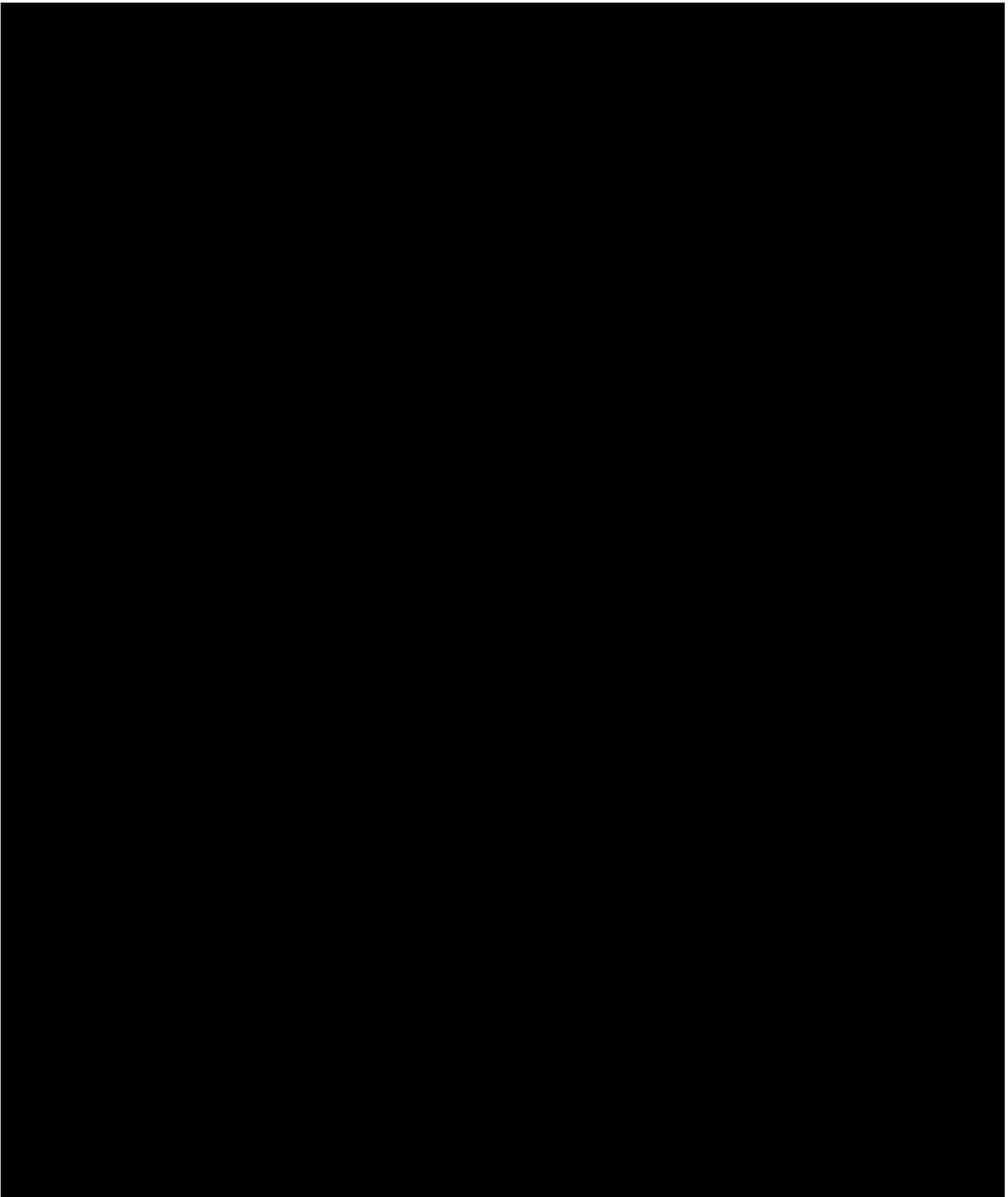


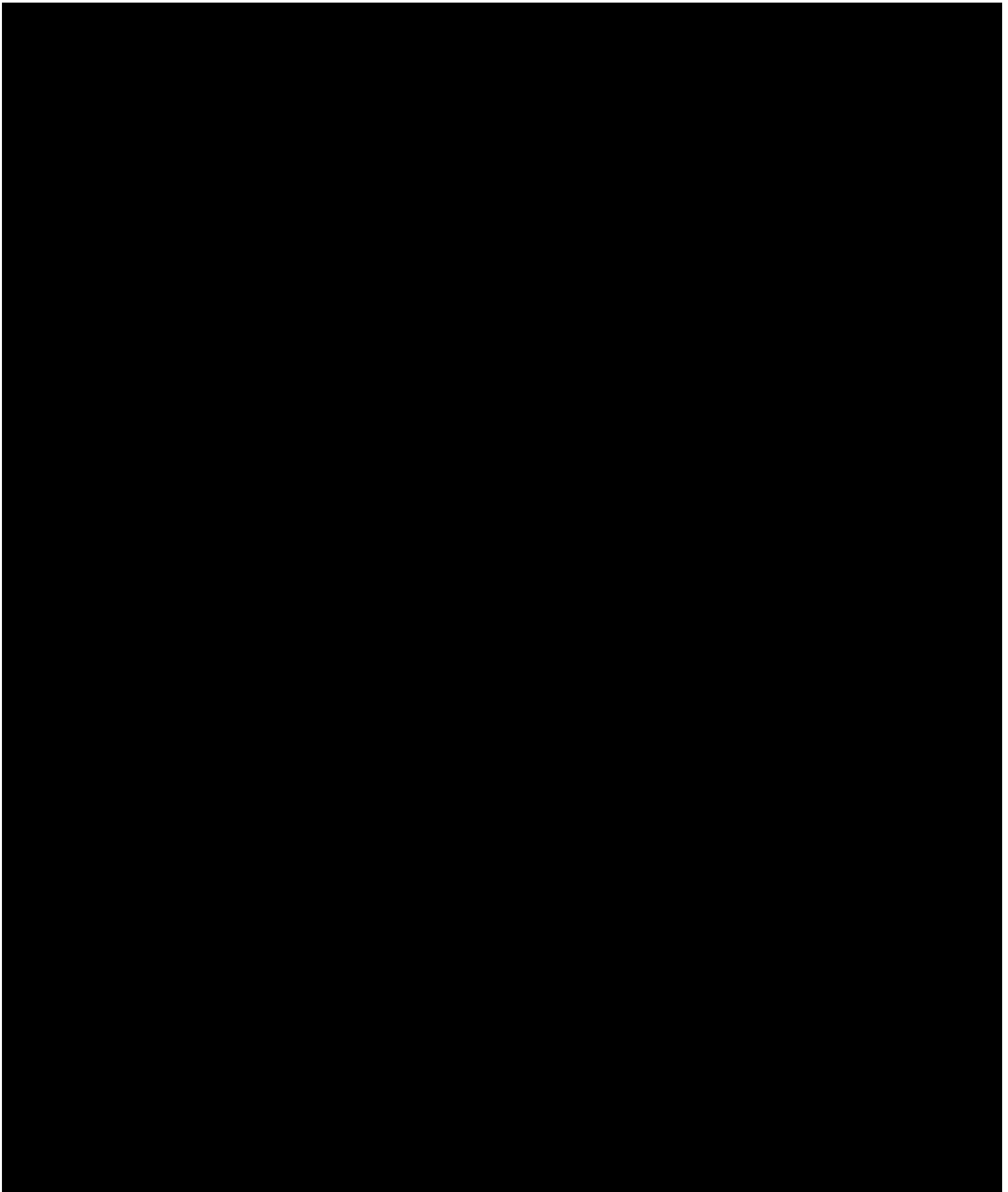


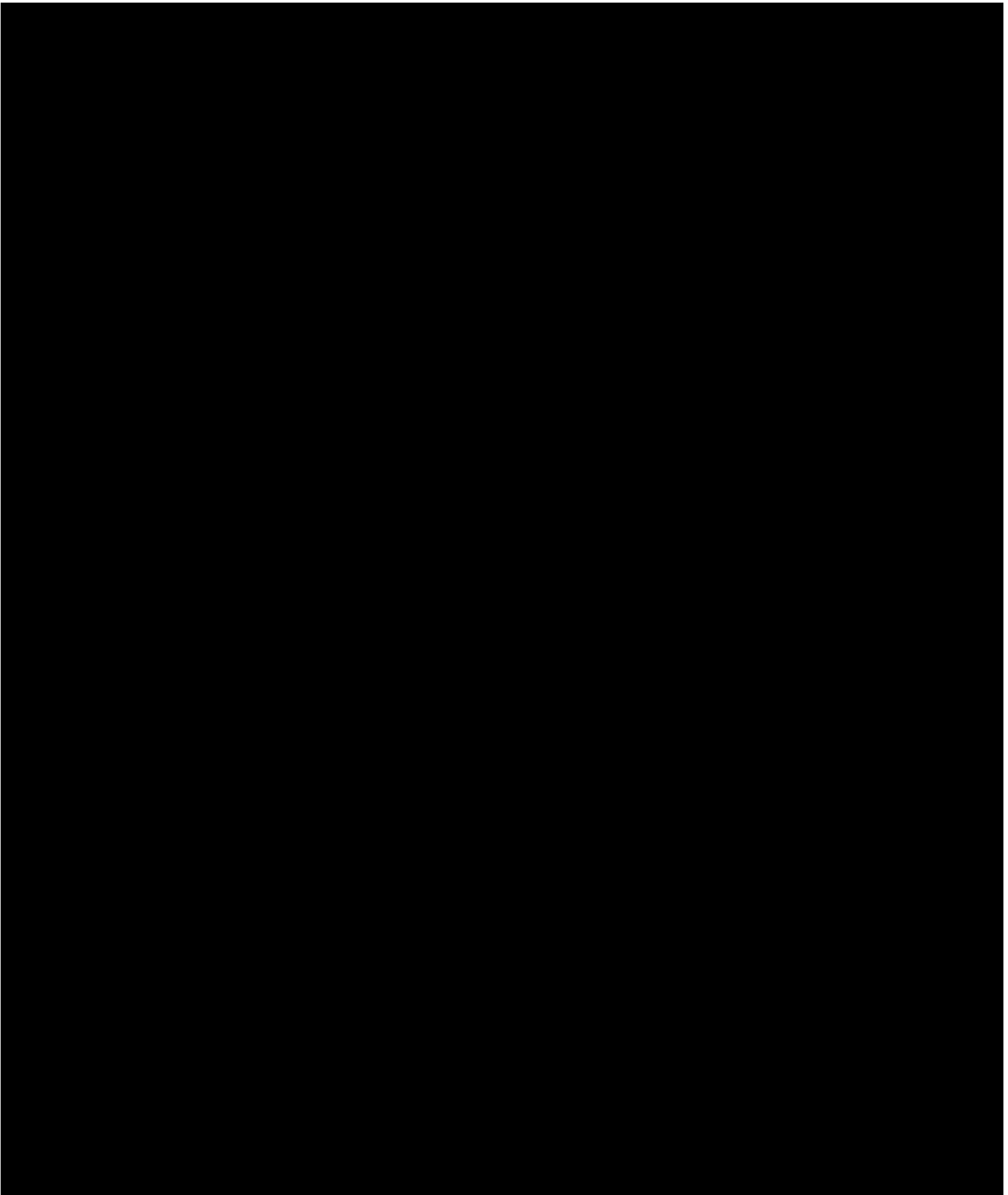


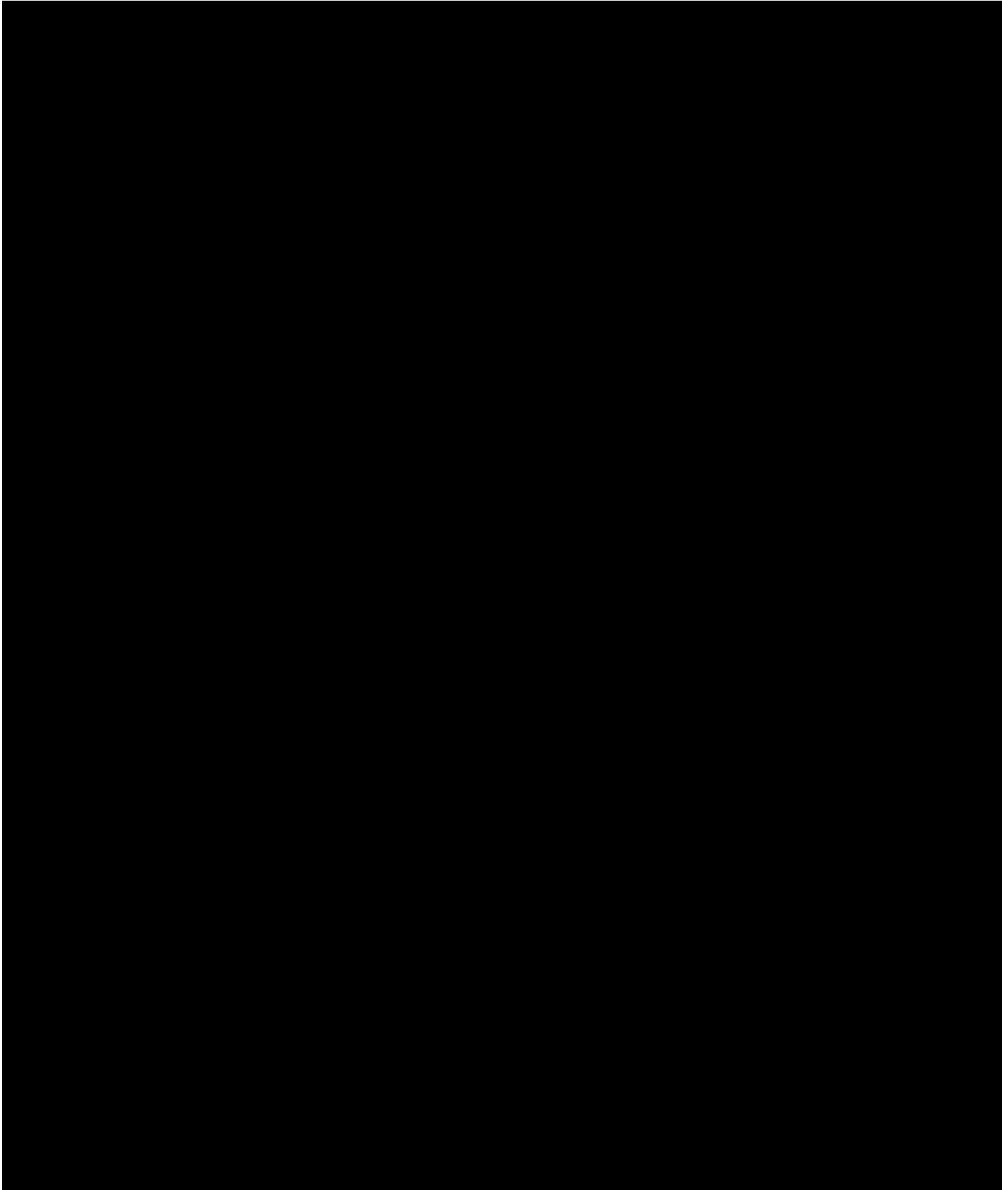




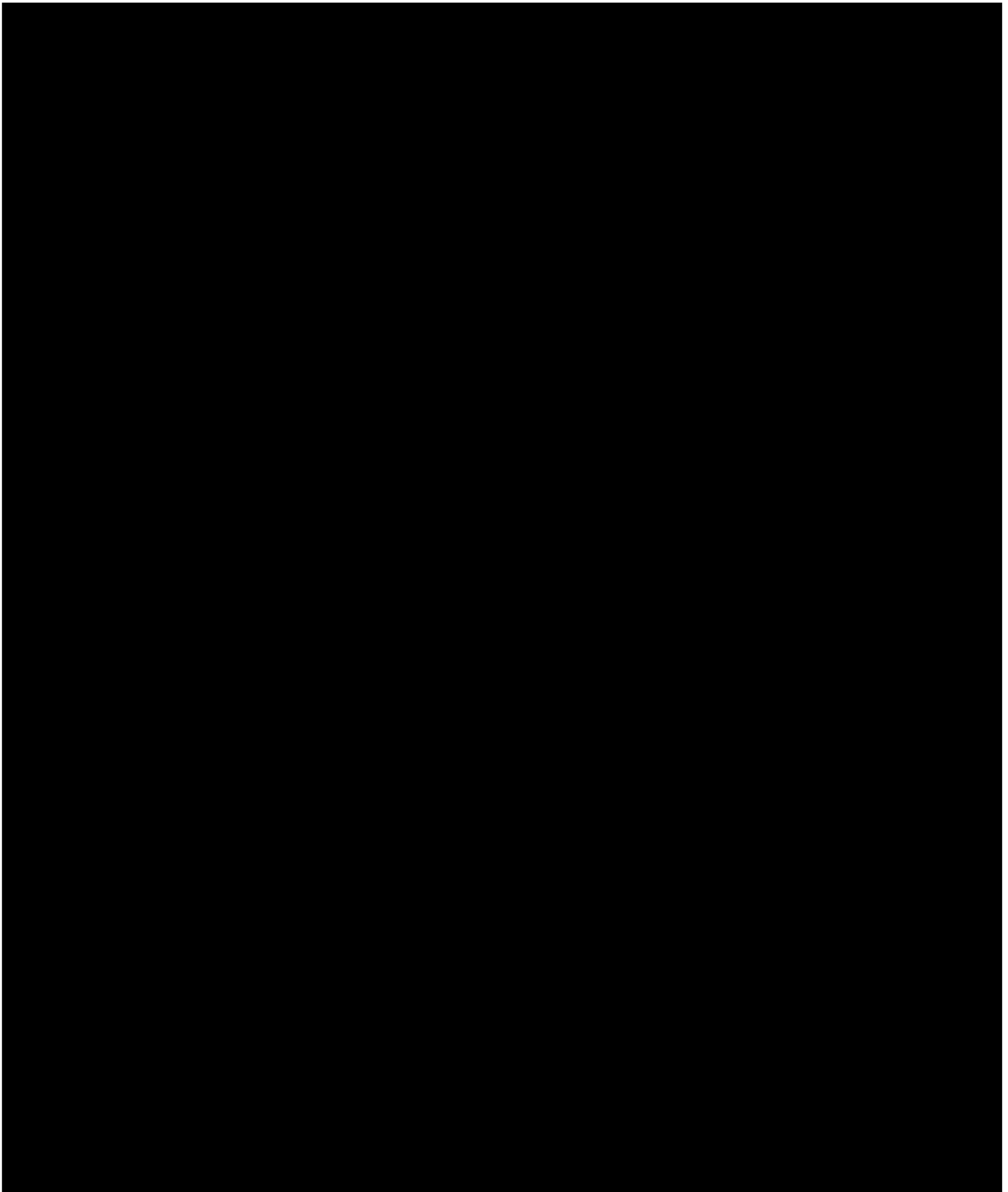


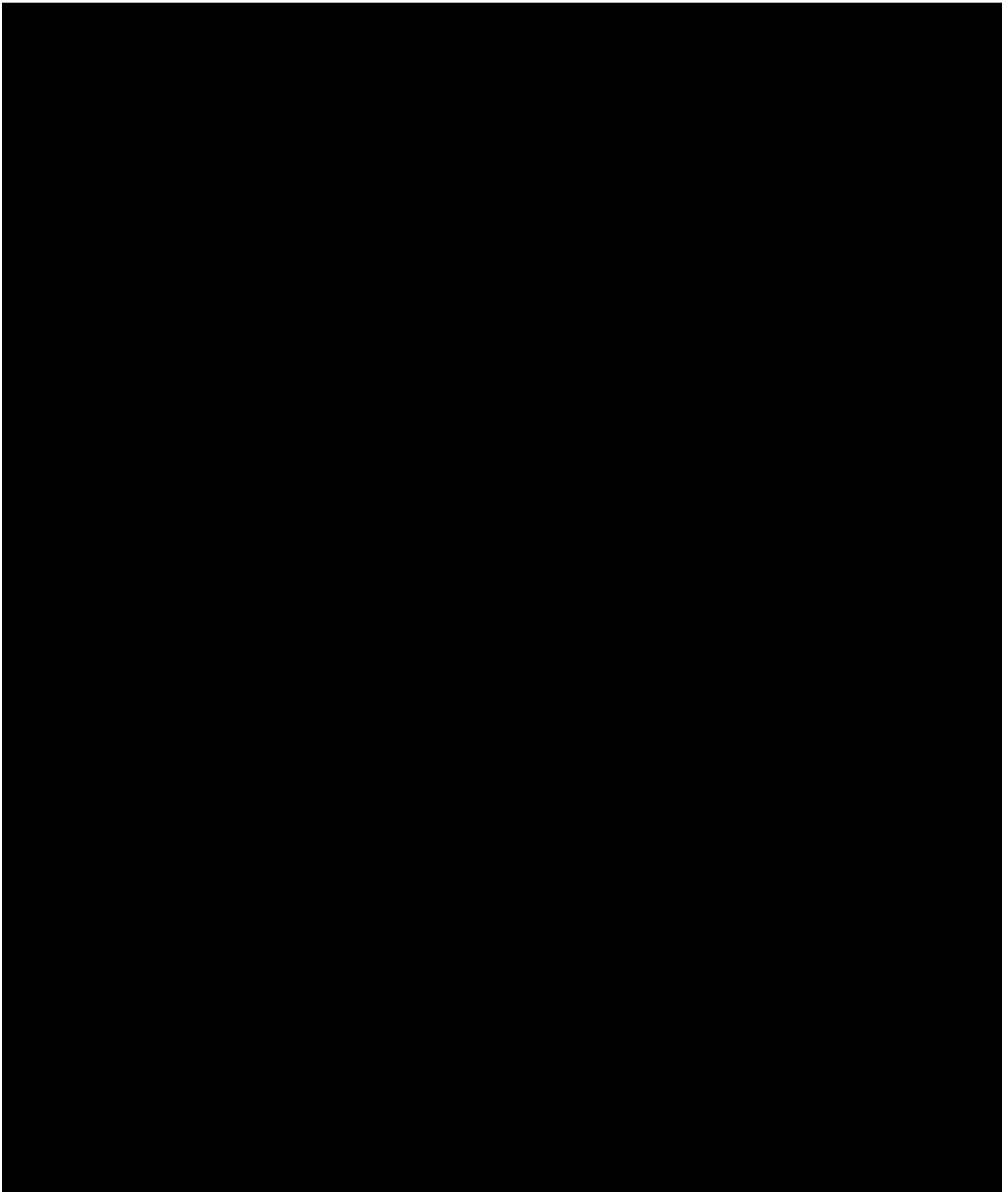


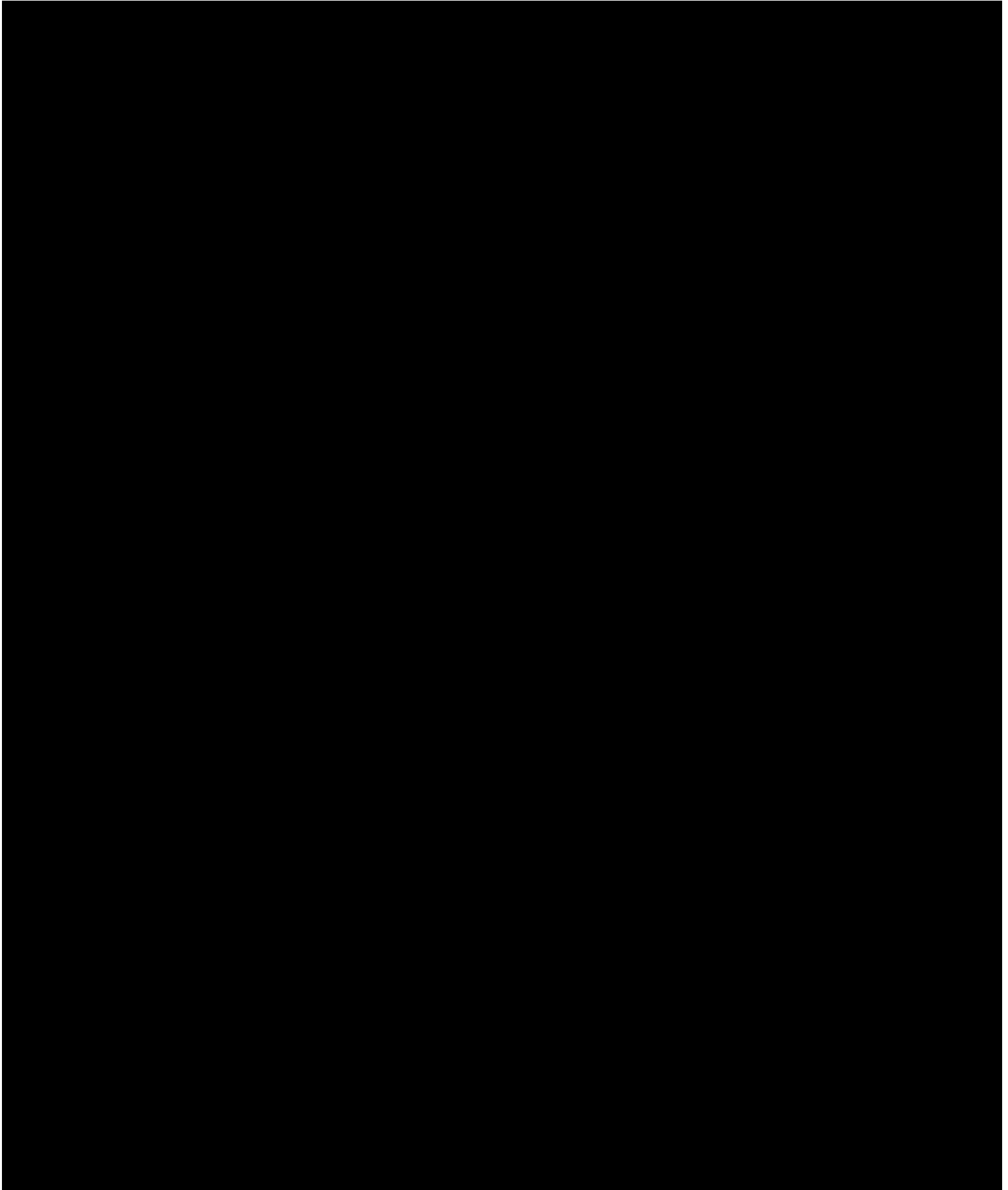


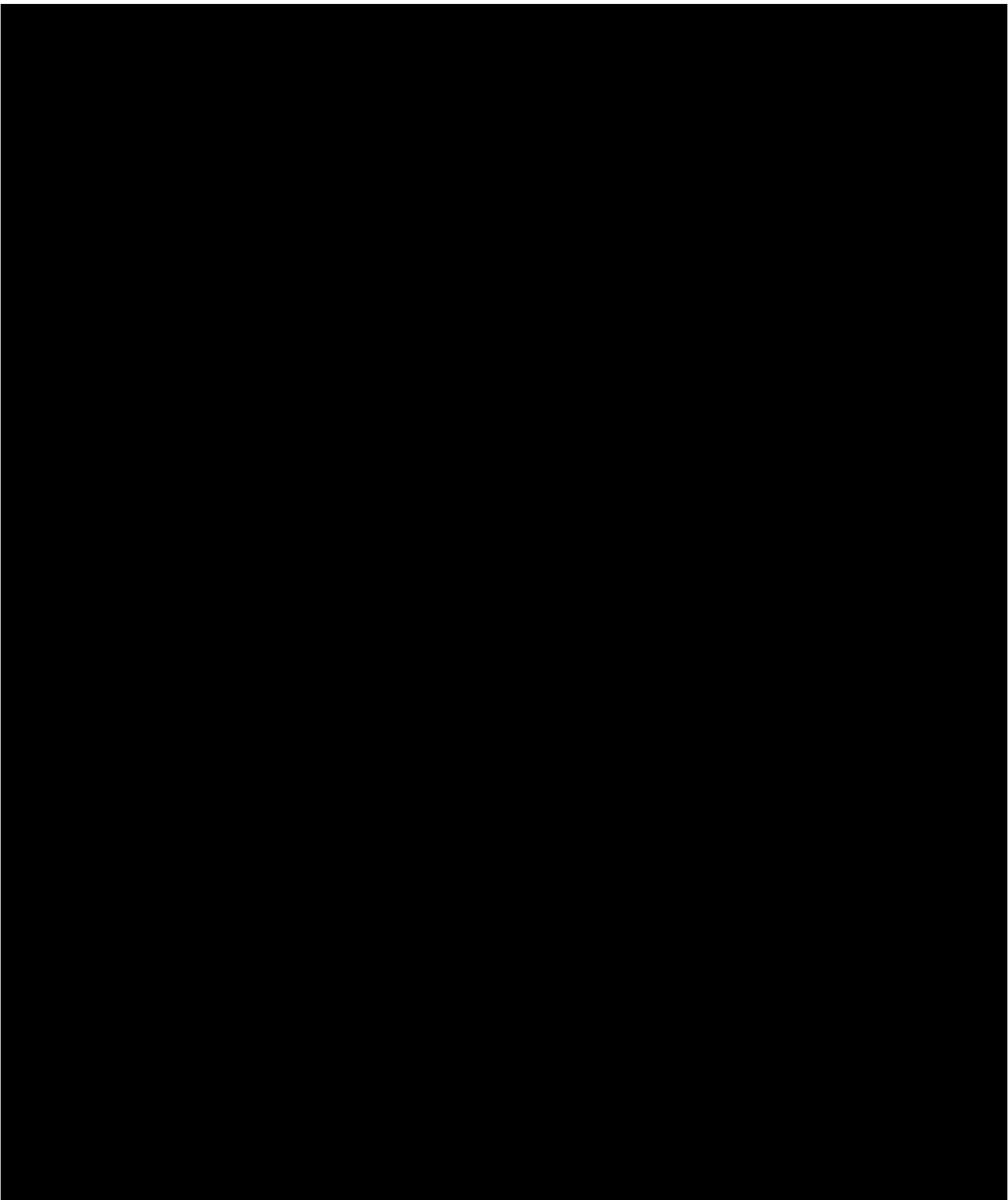


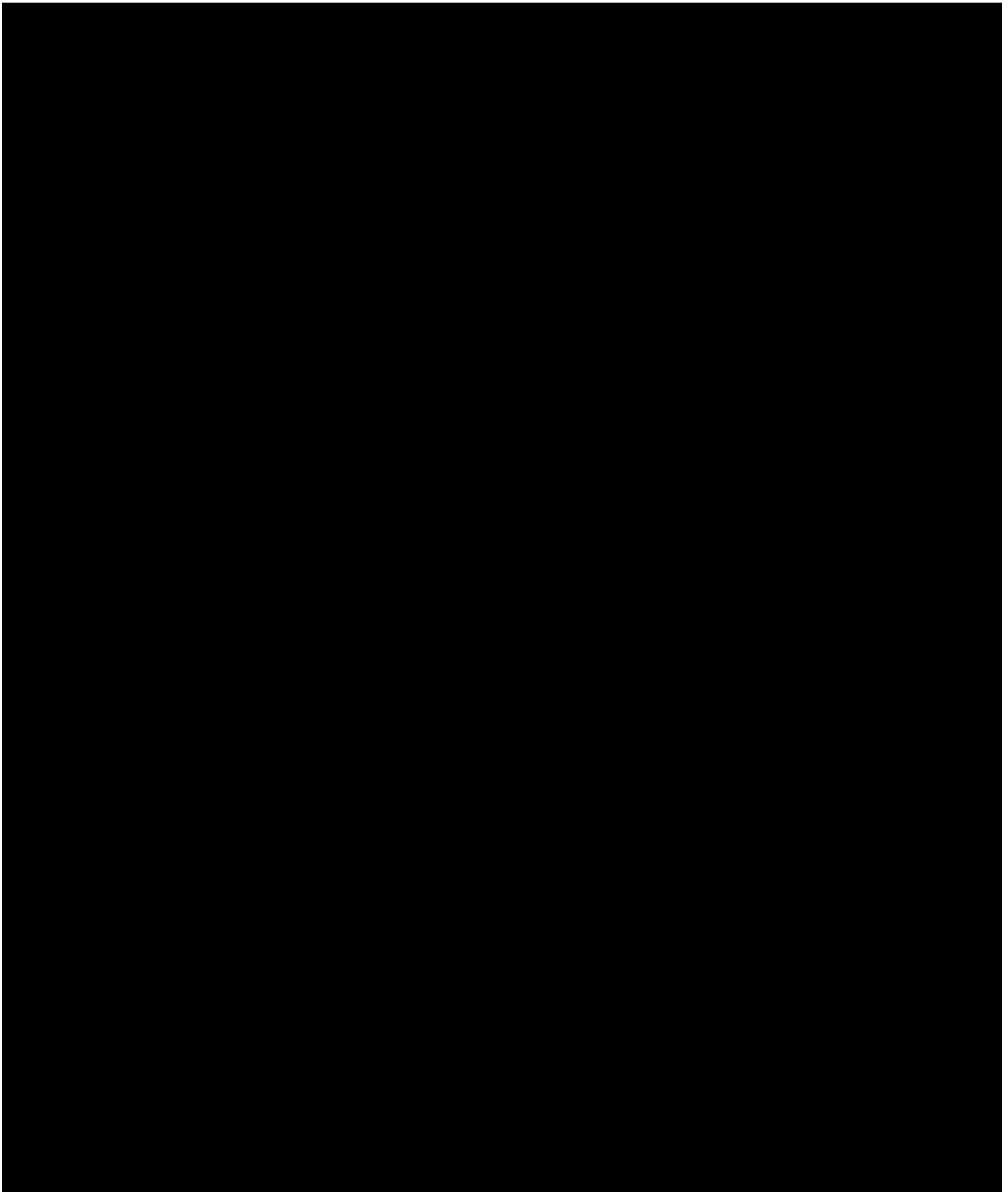


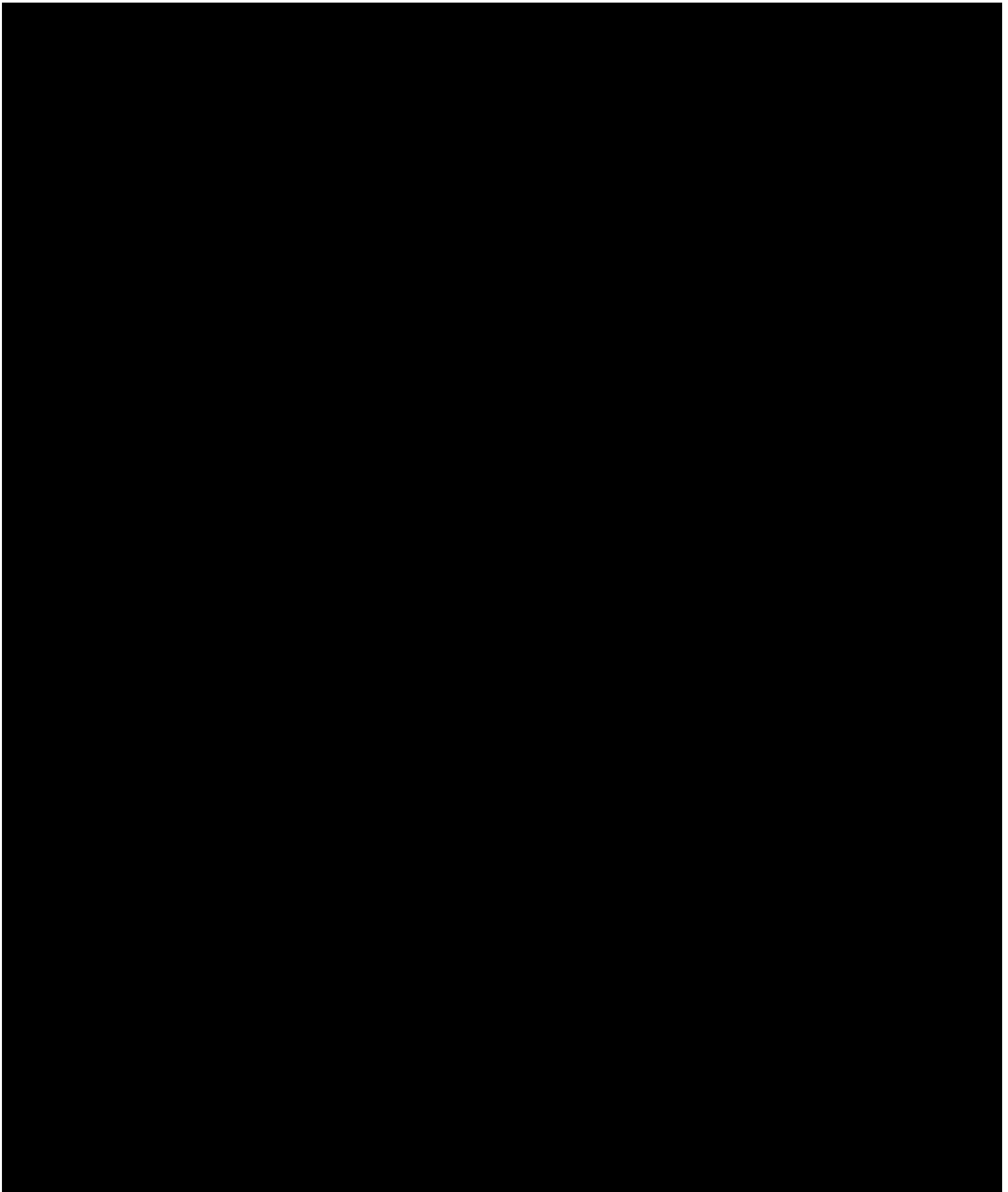


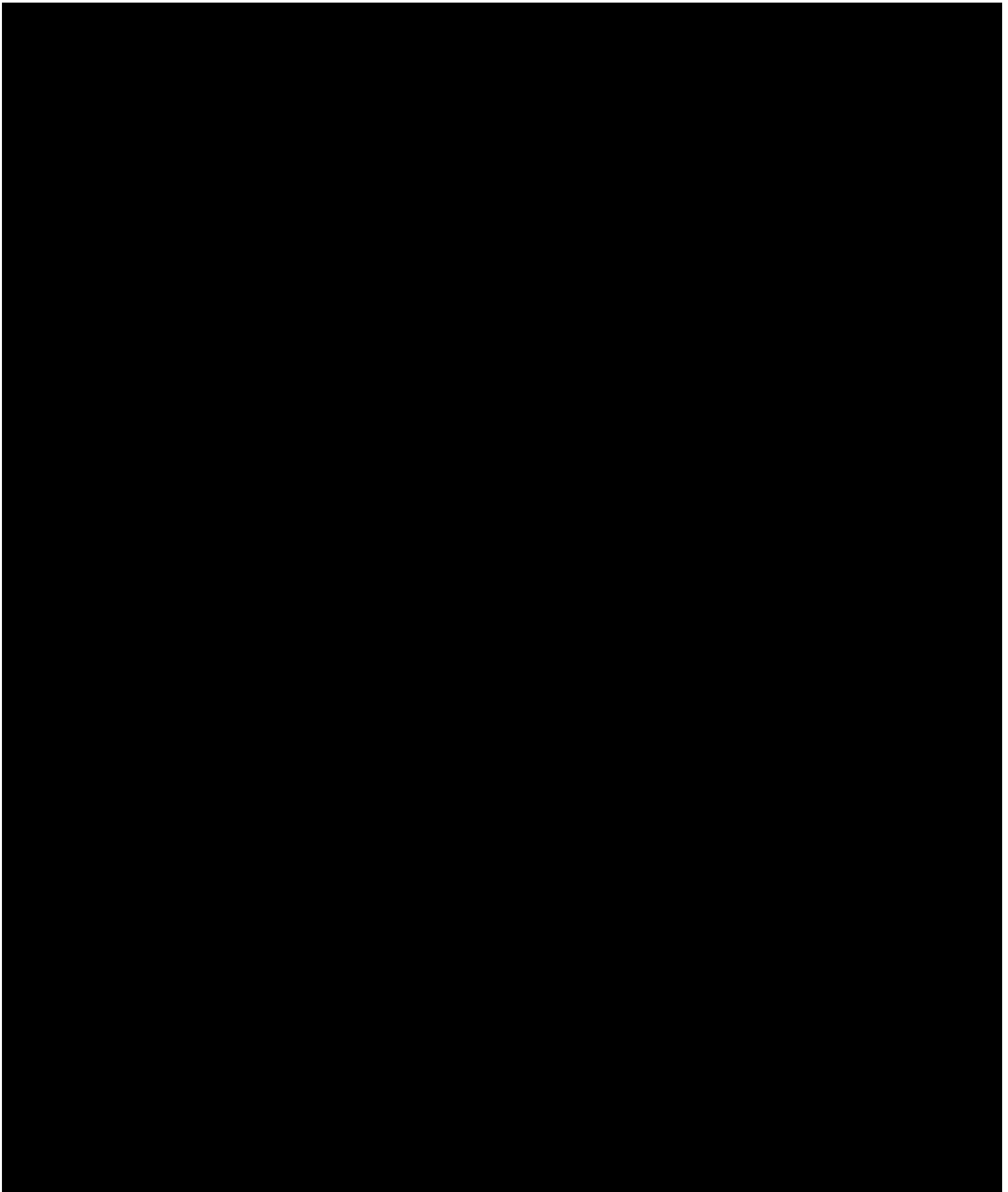












# **EXHIBIT 33**



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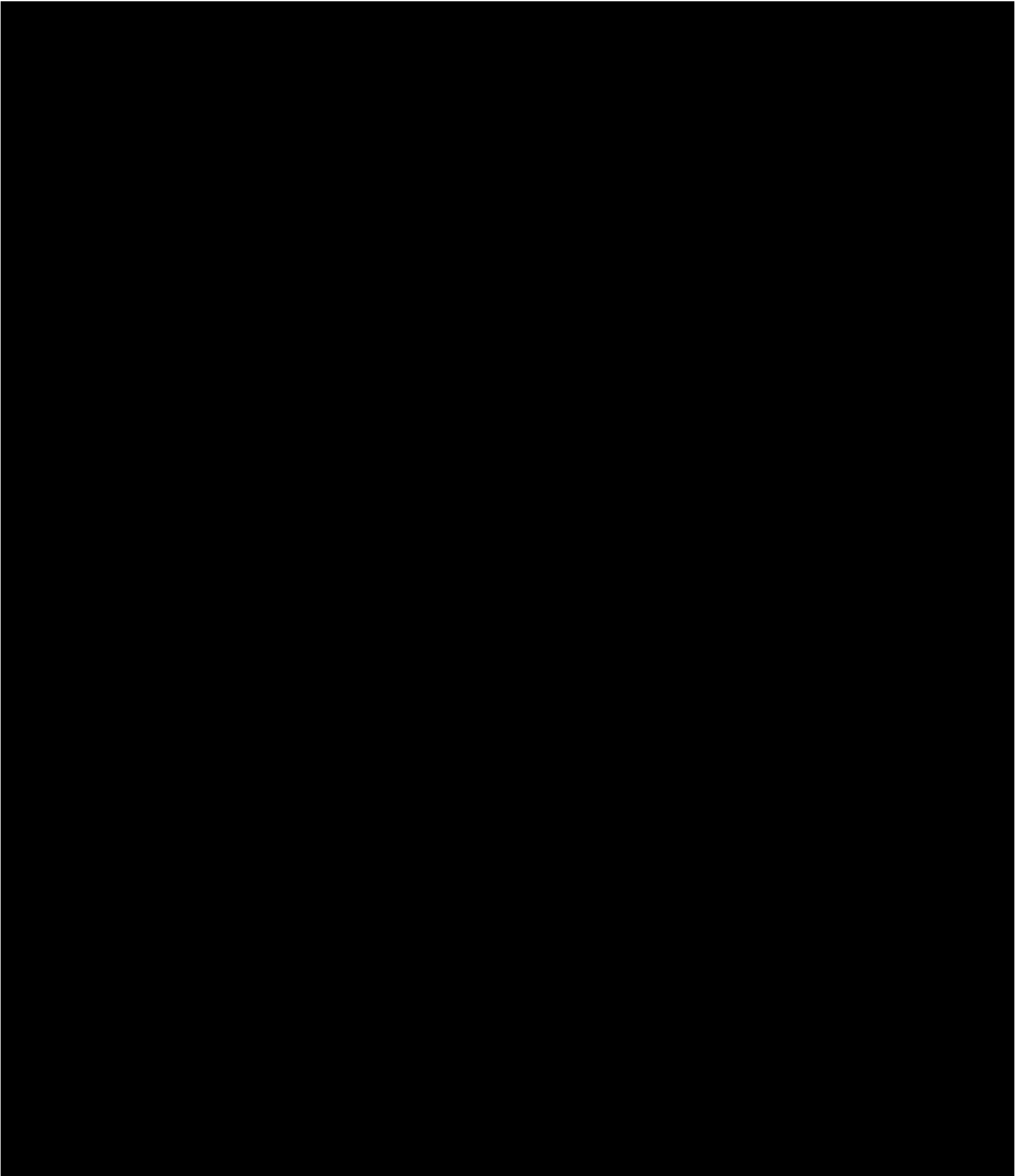
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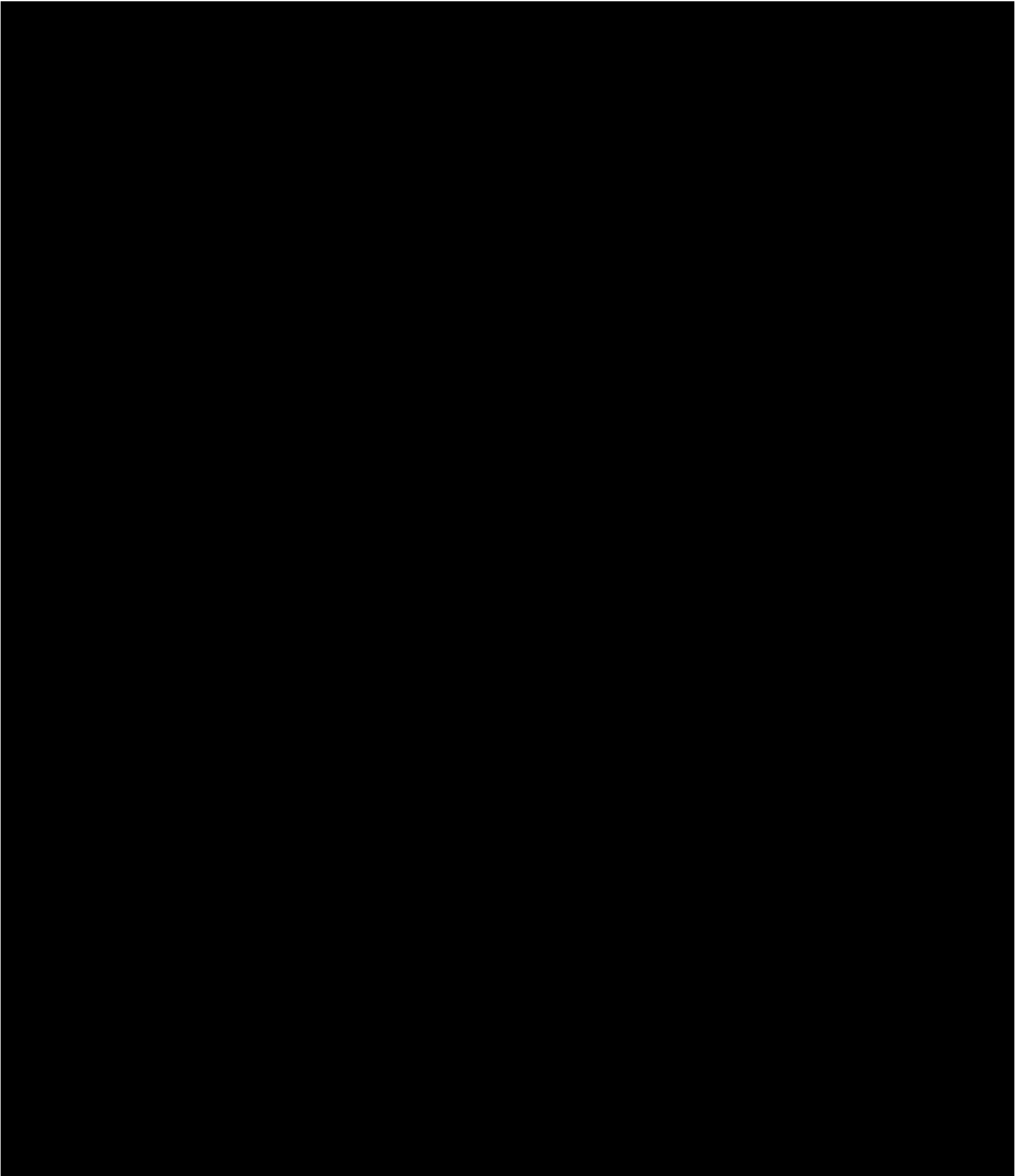
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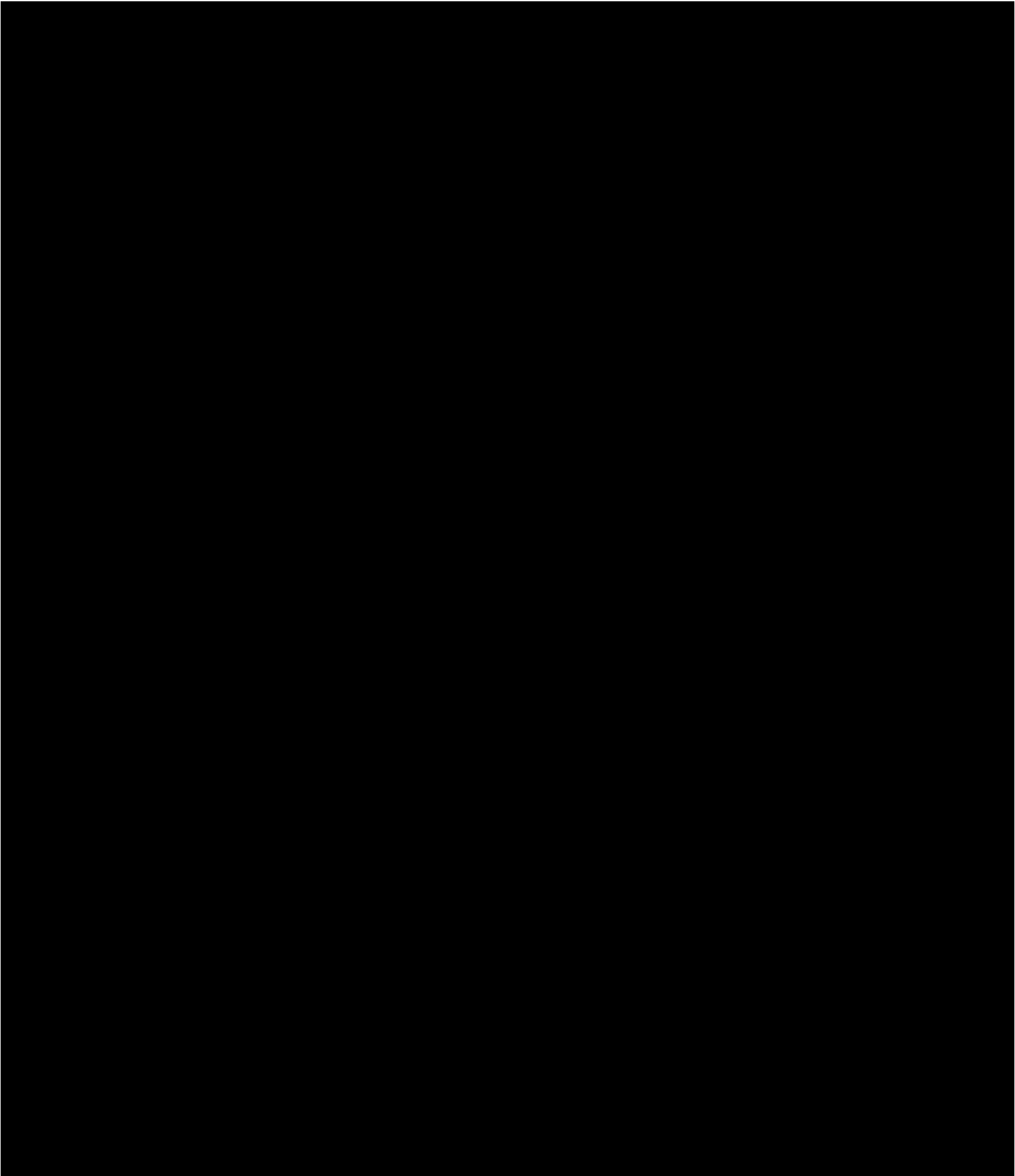
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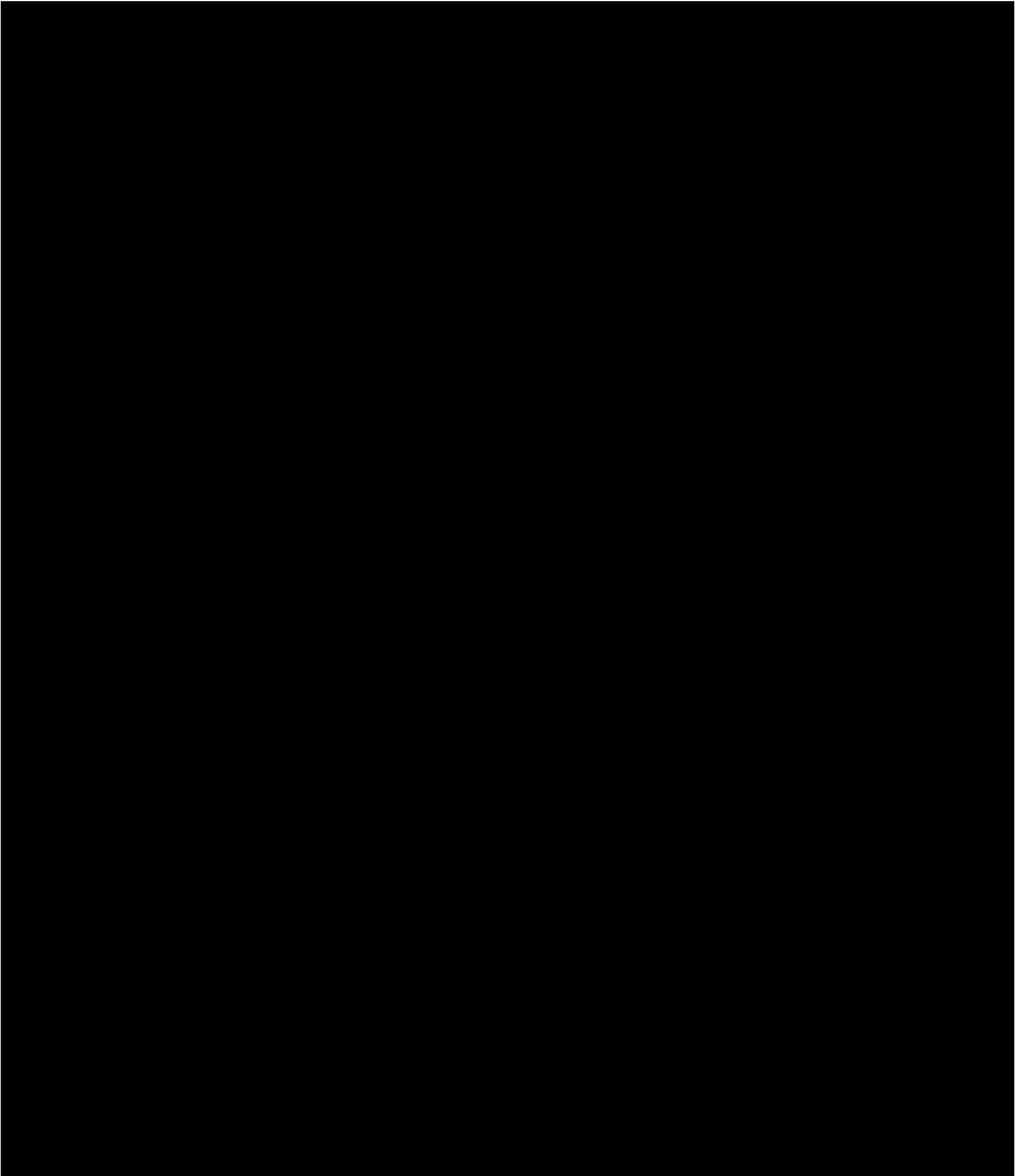
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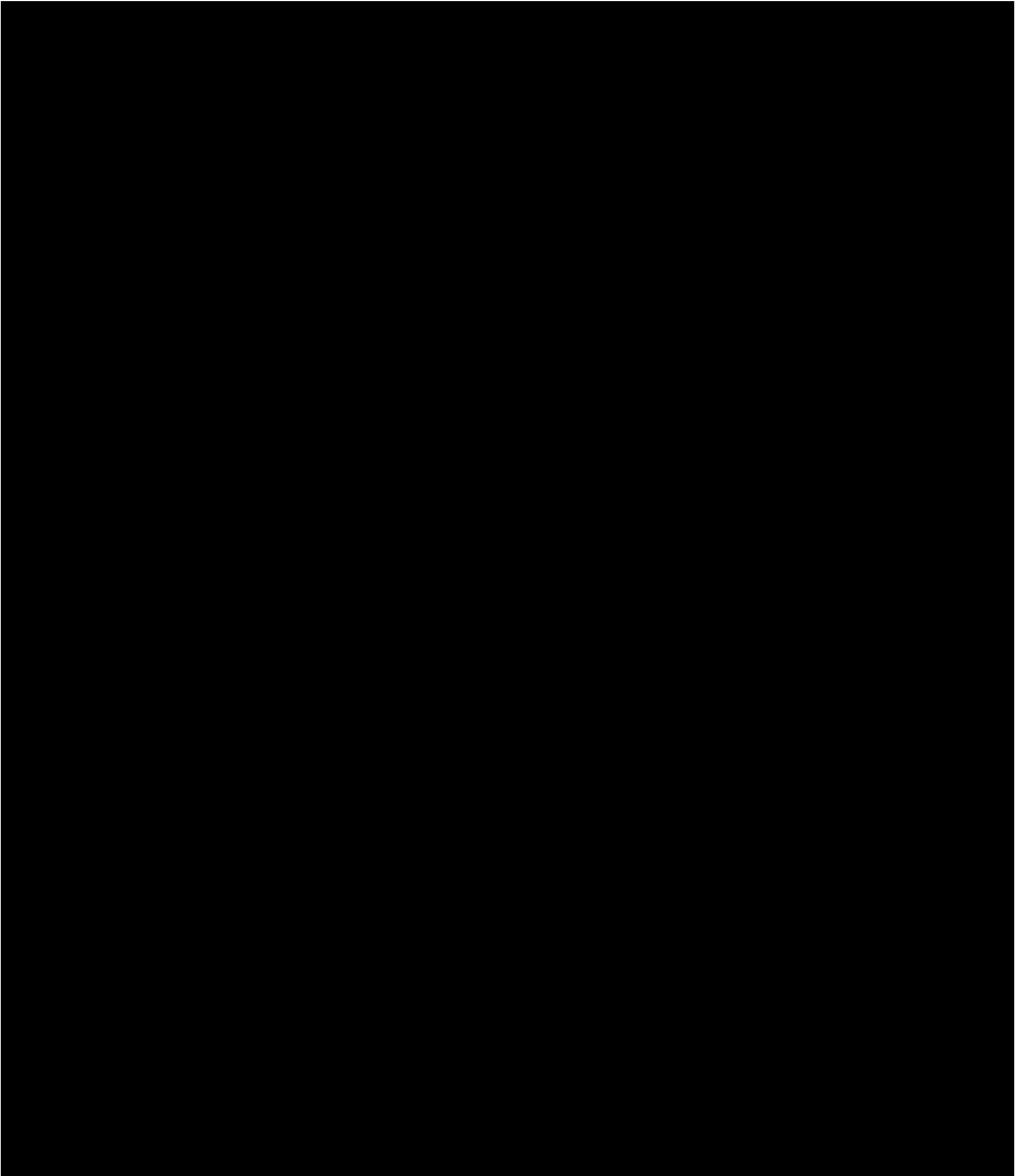
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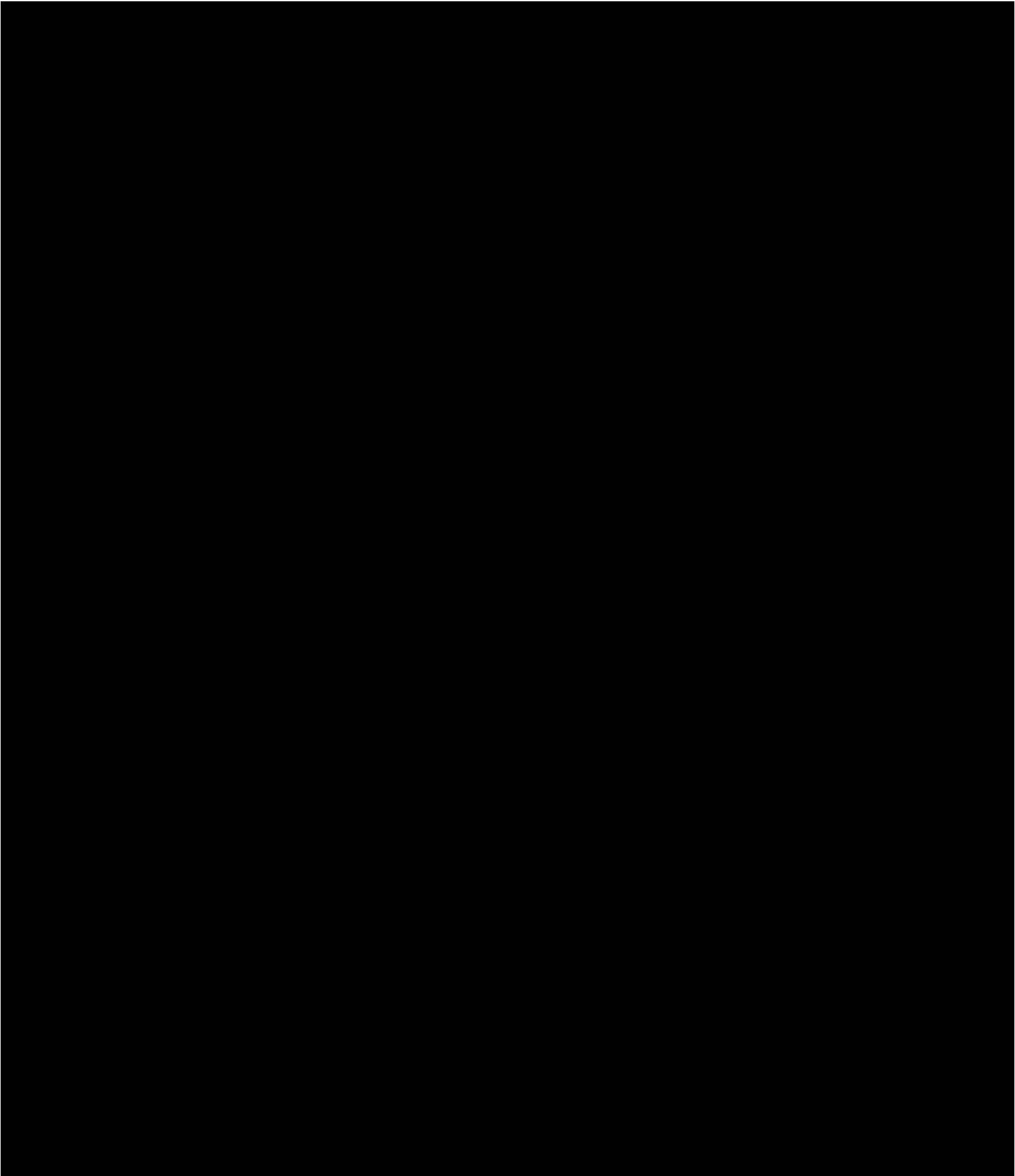




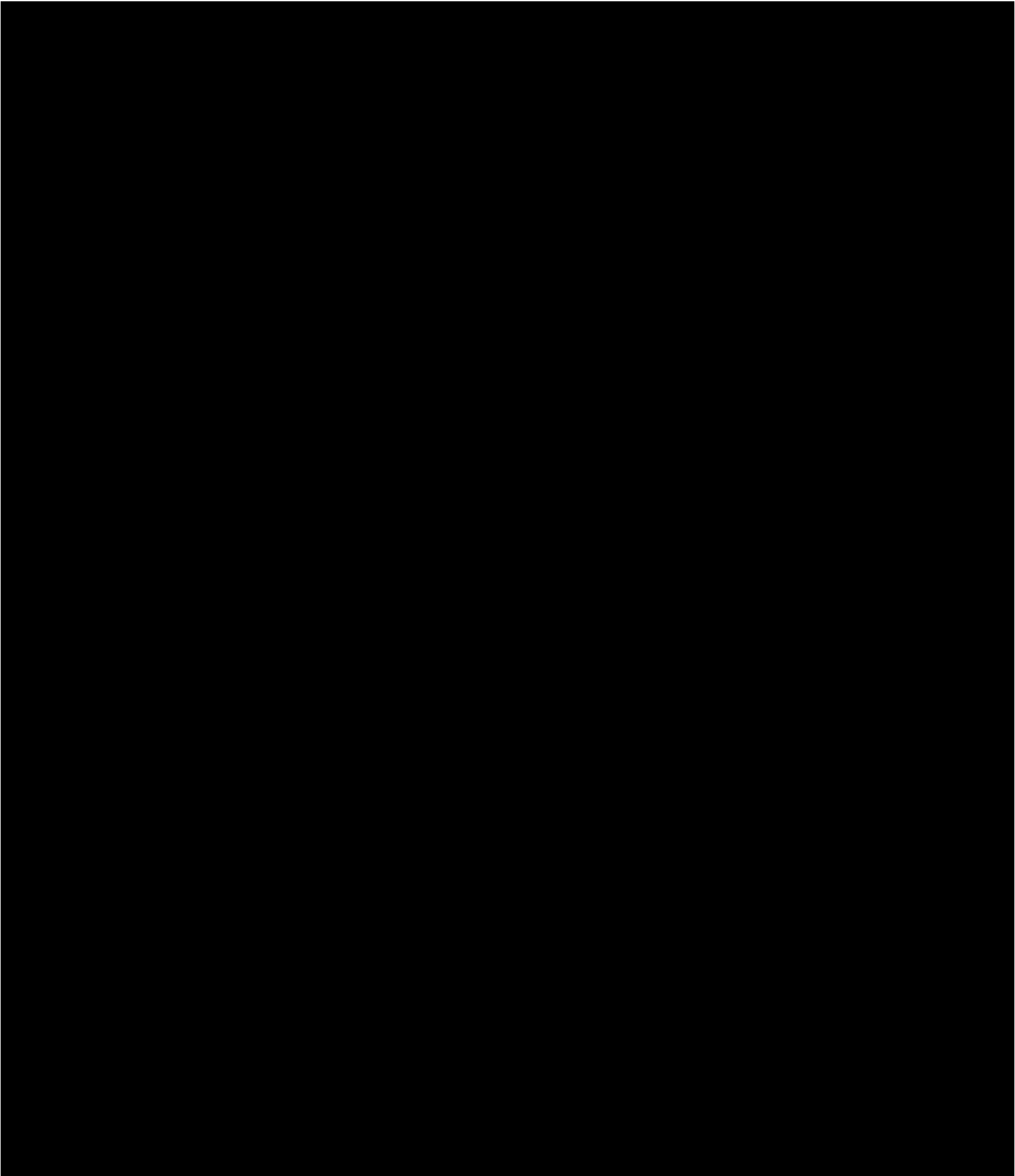


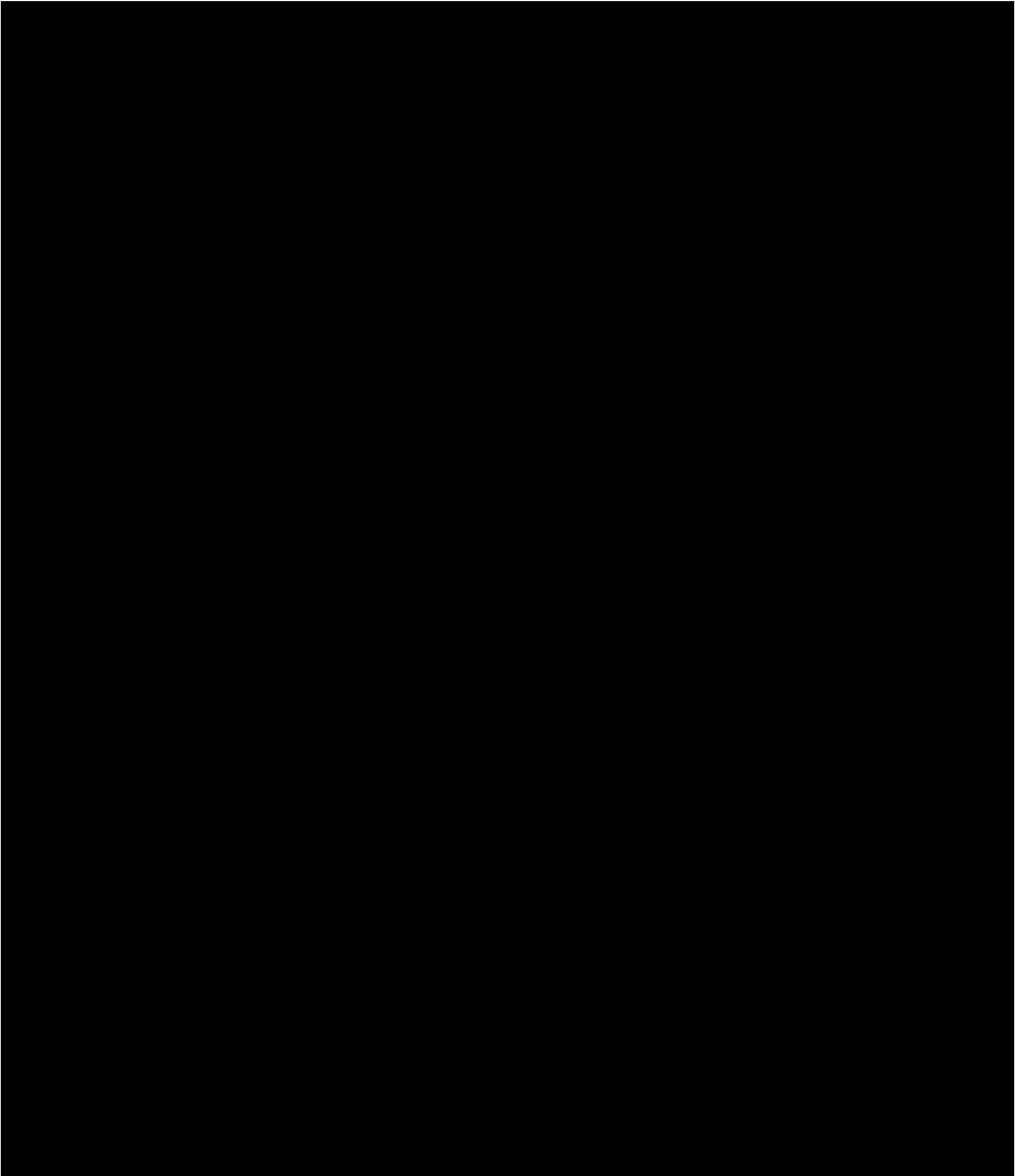


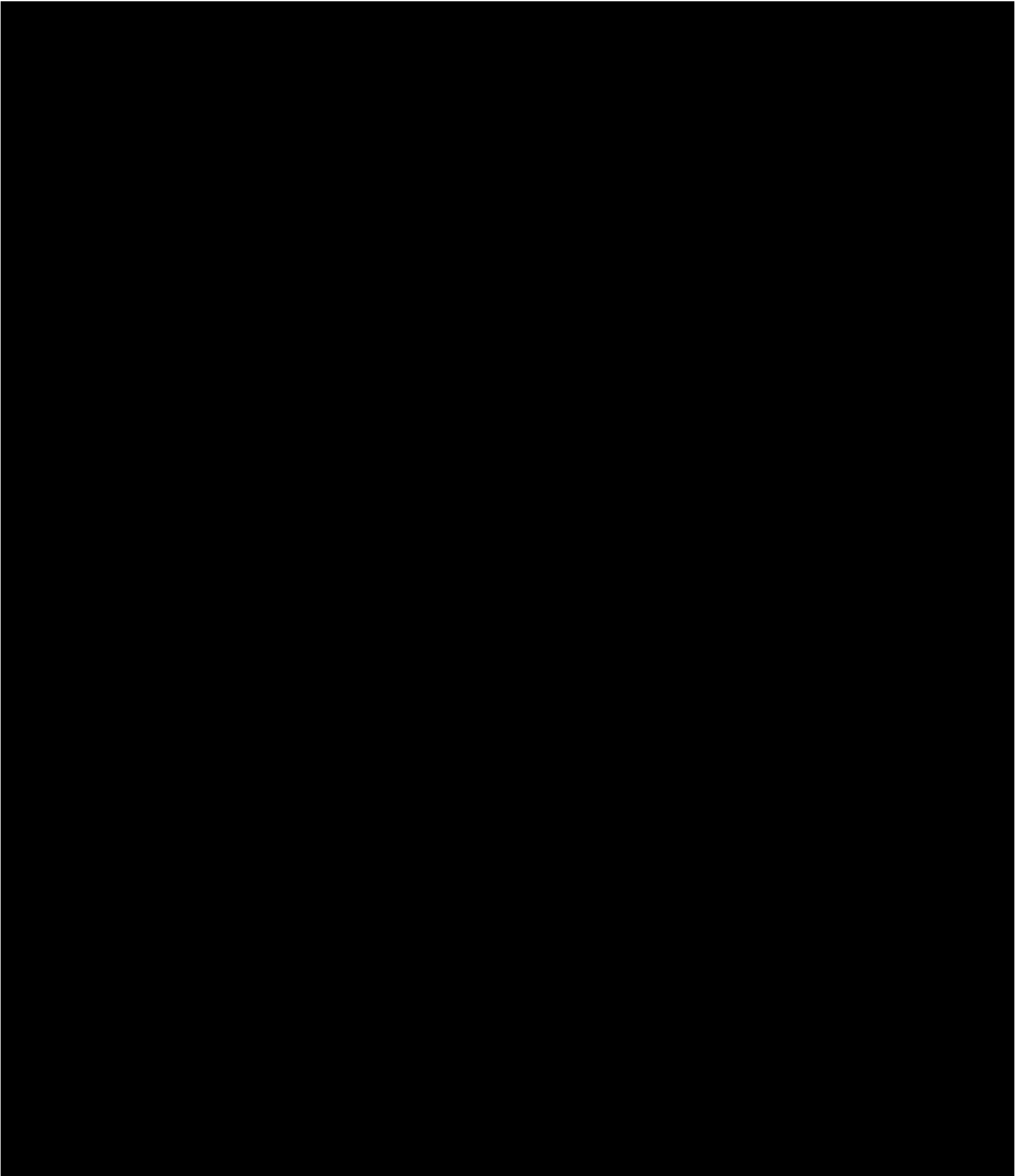


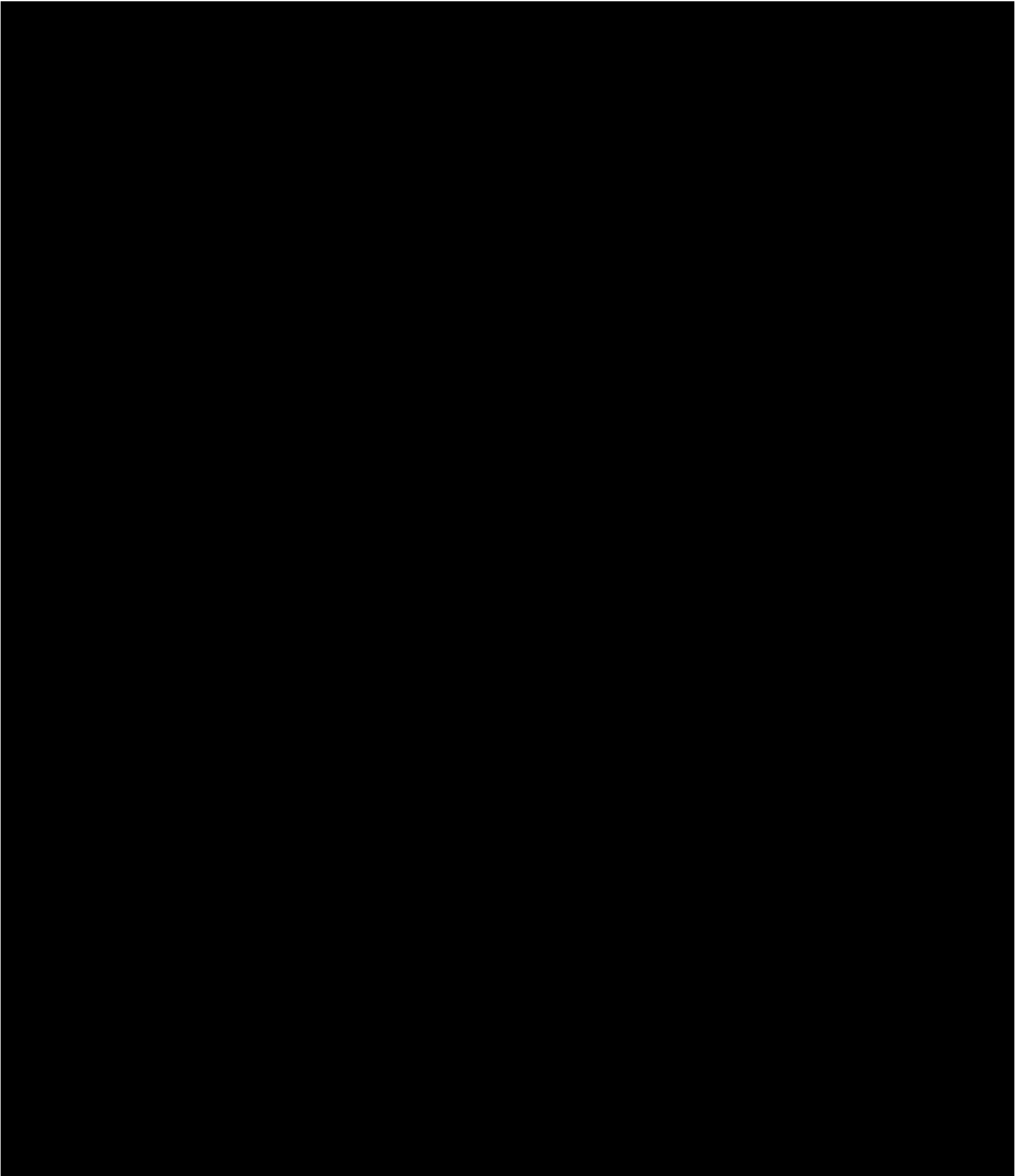


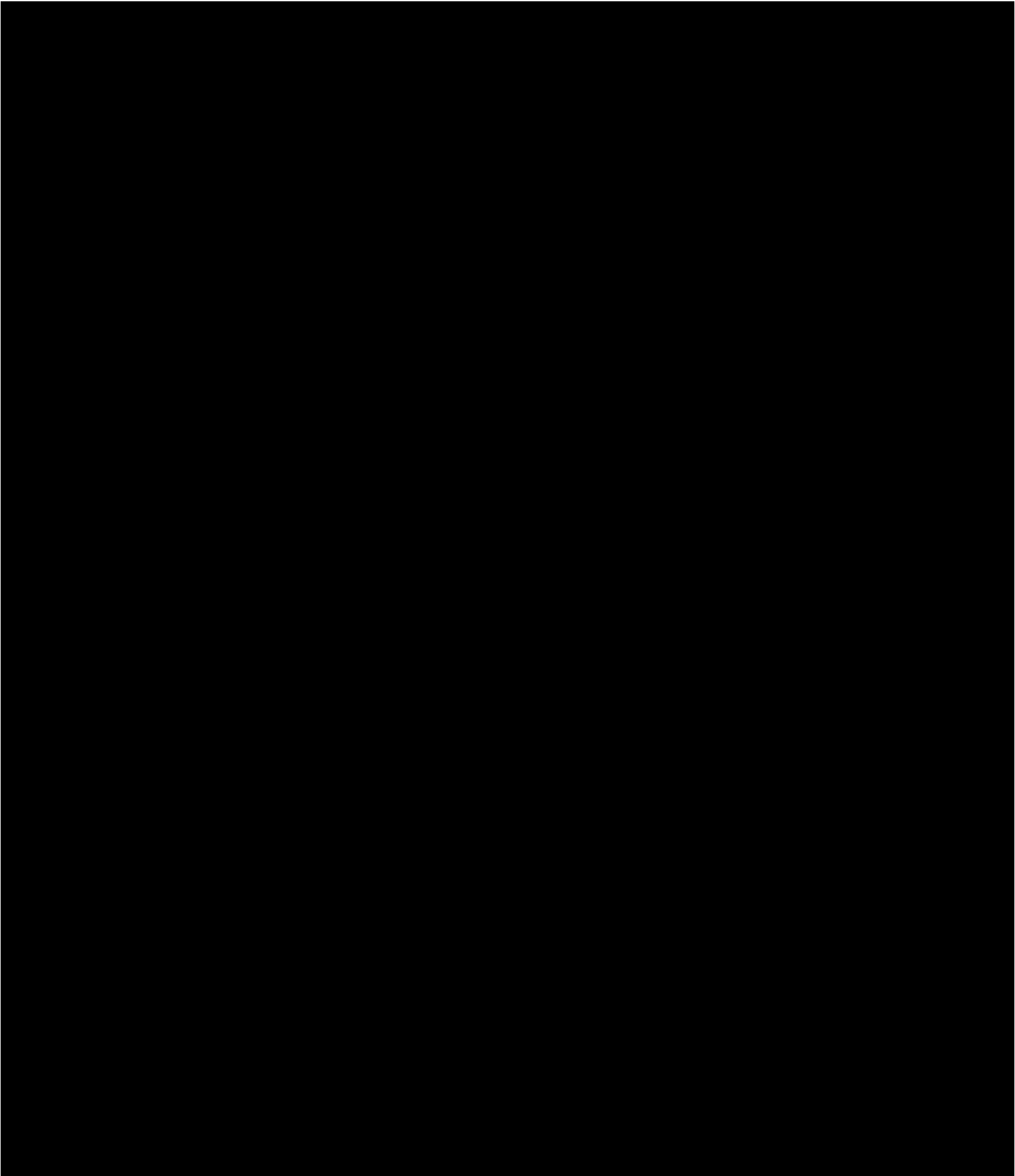


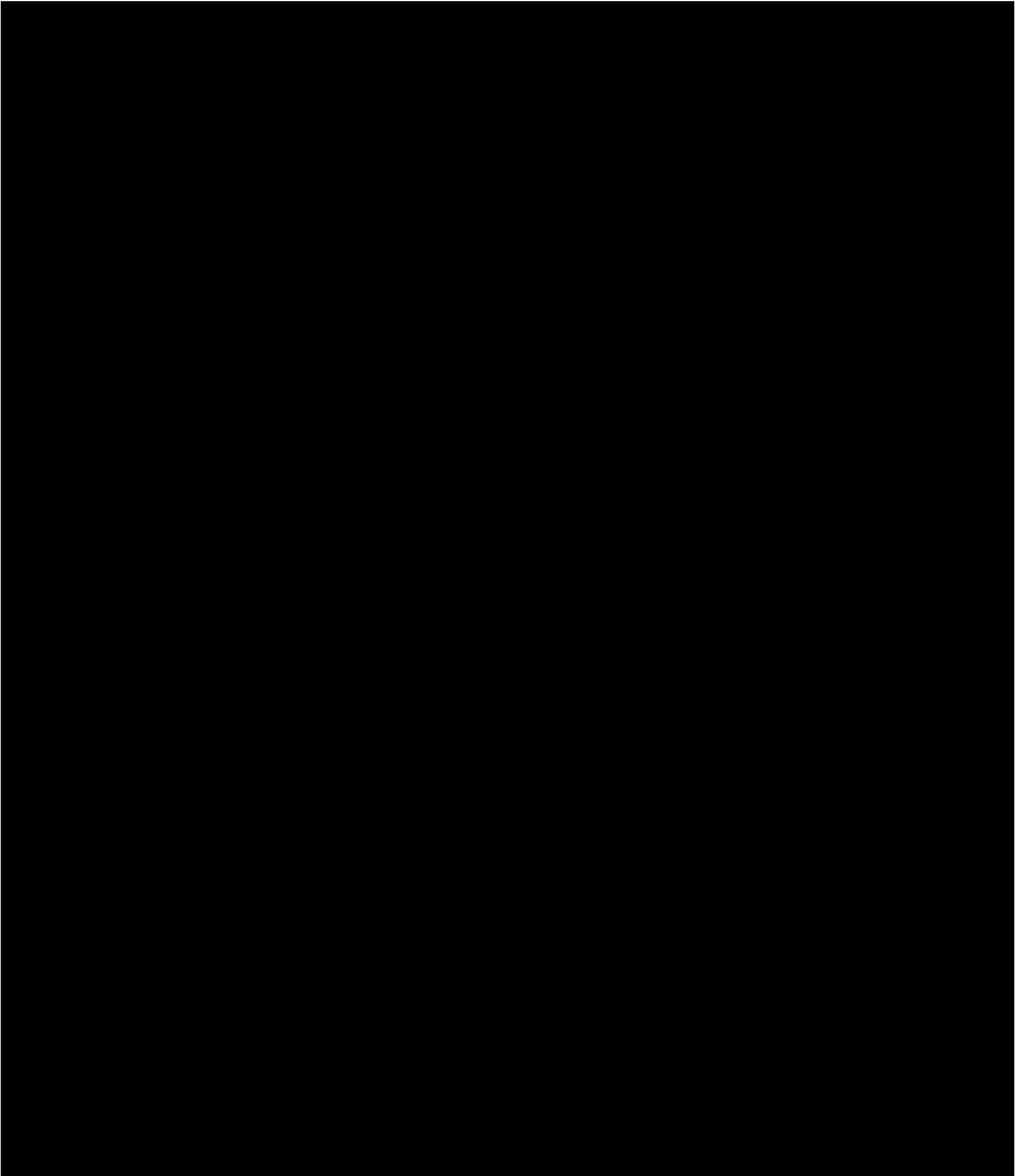


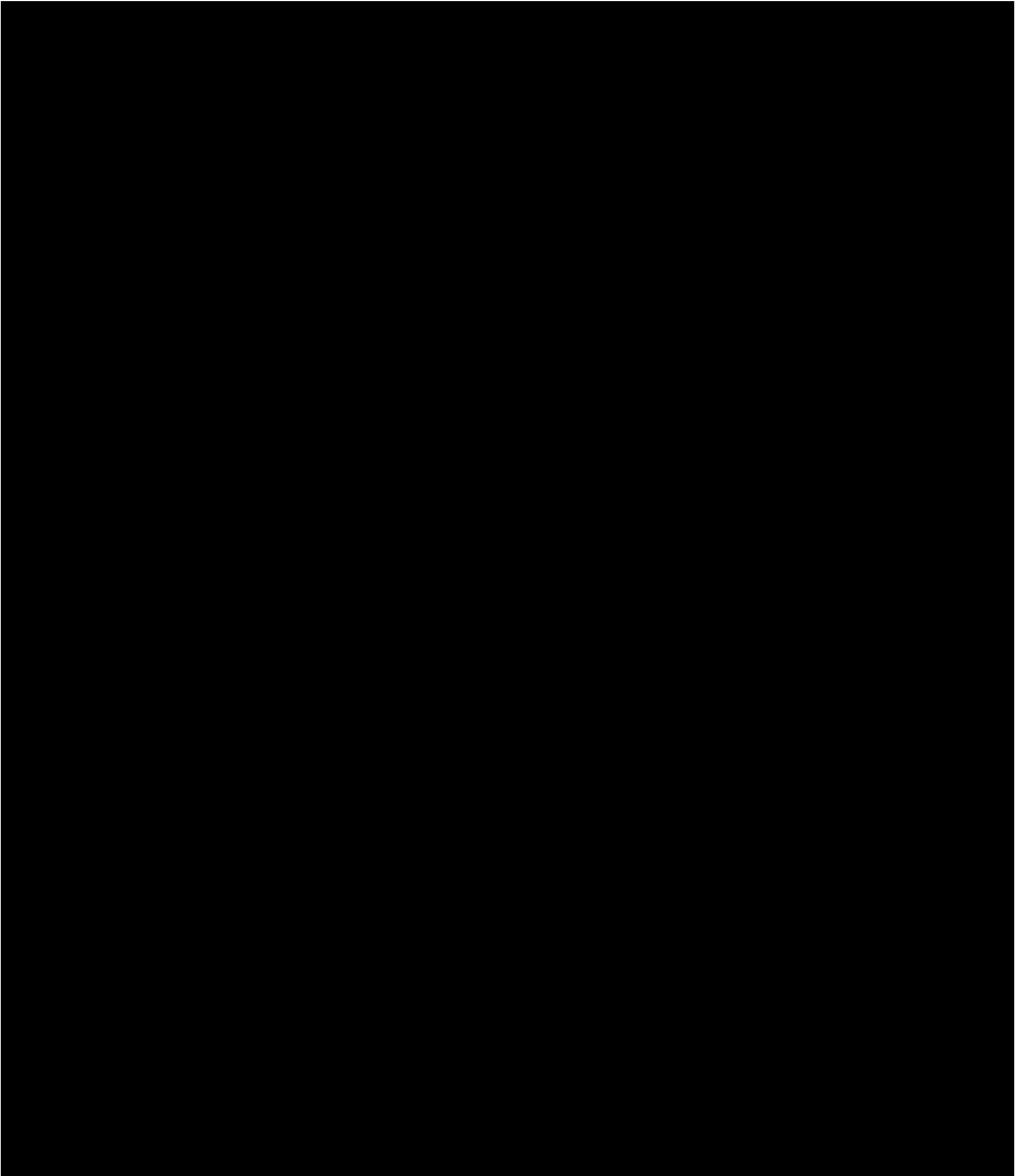


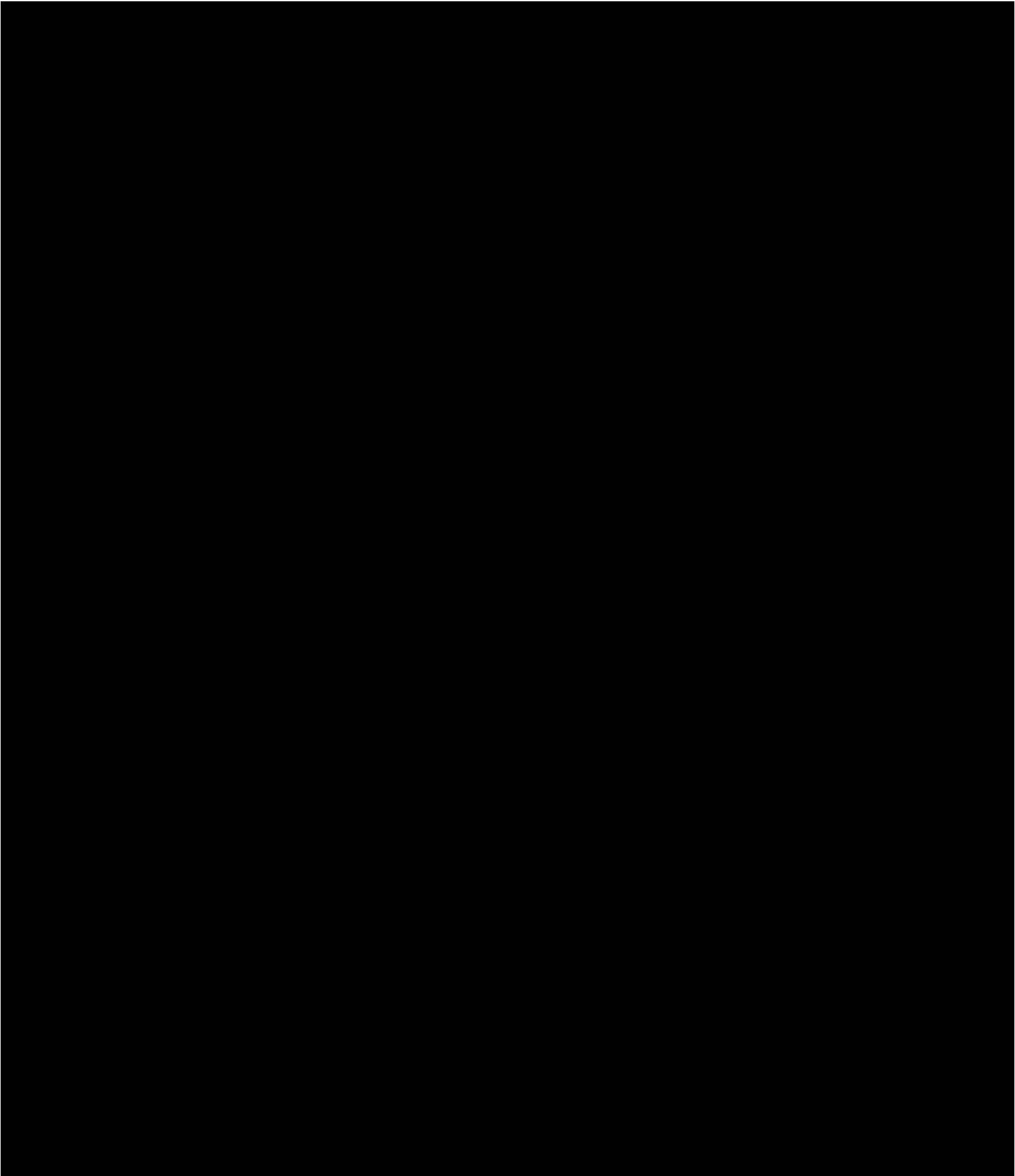




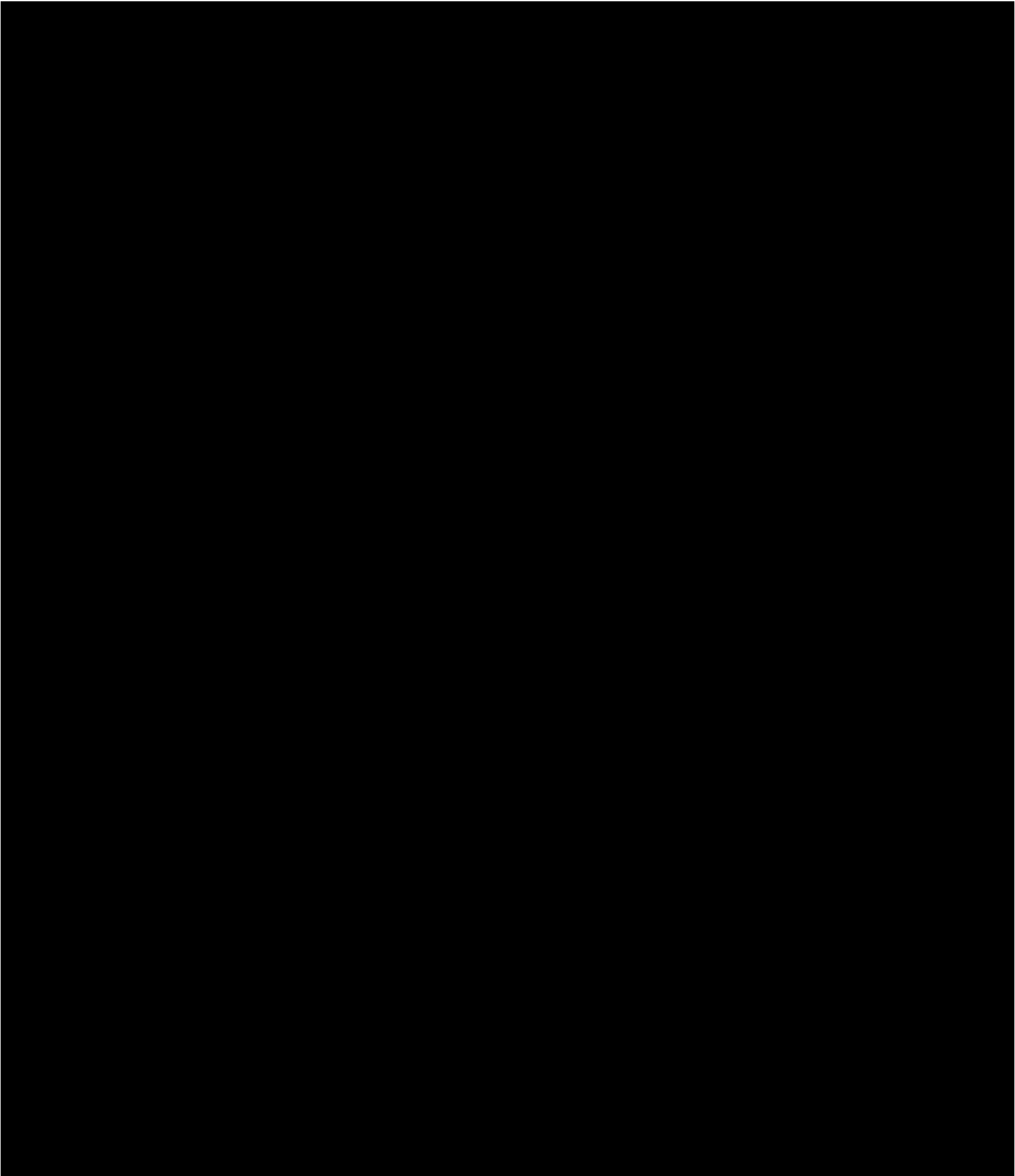


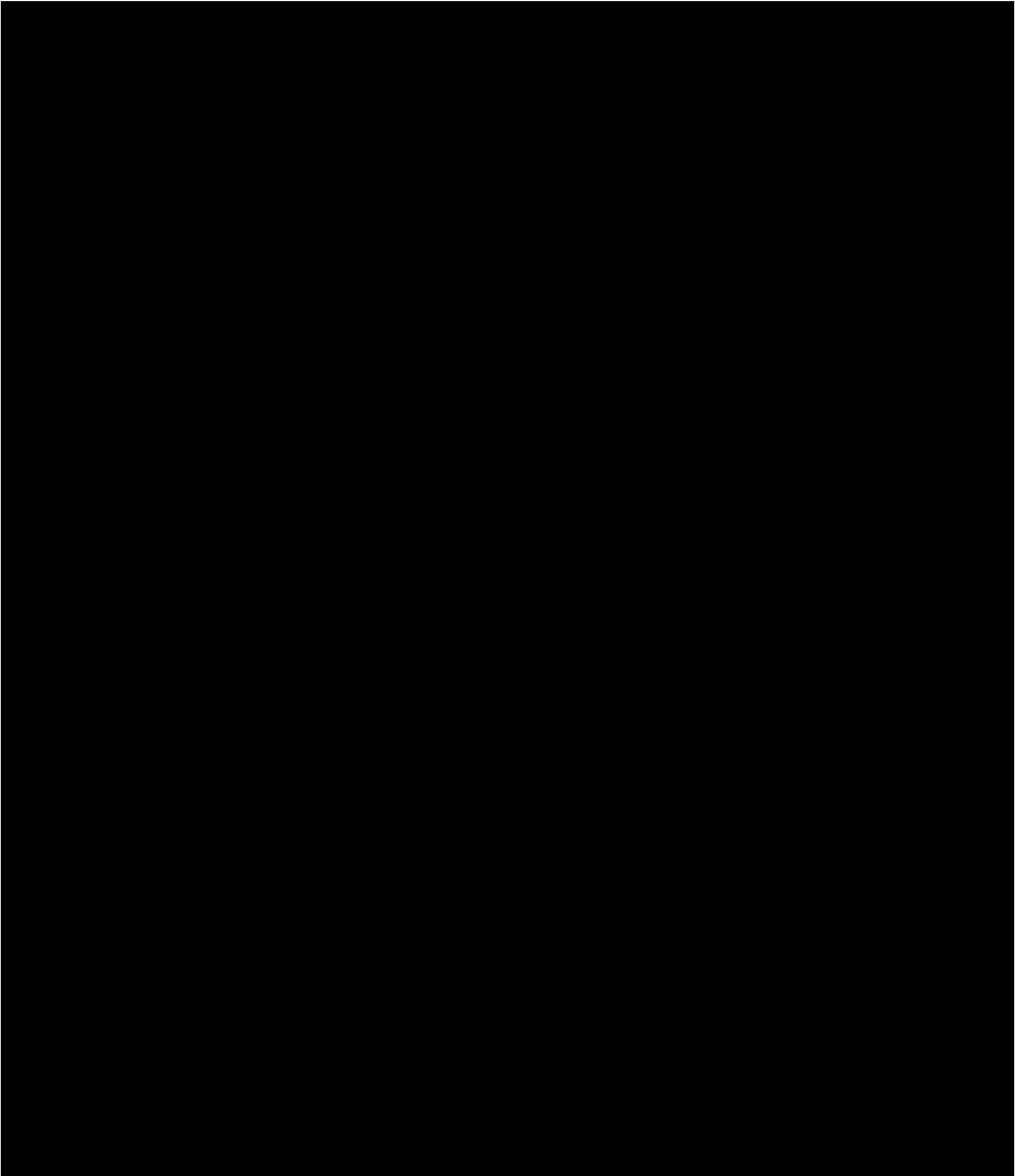


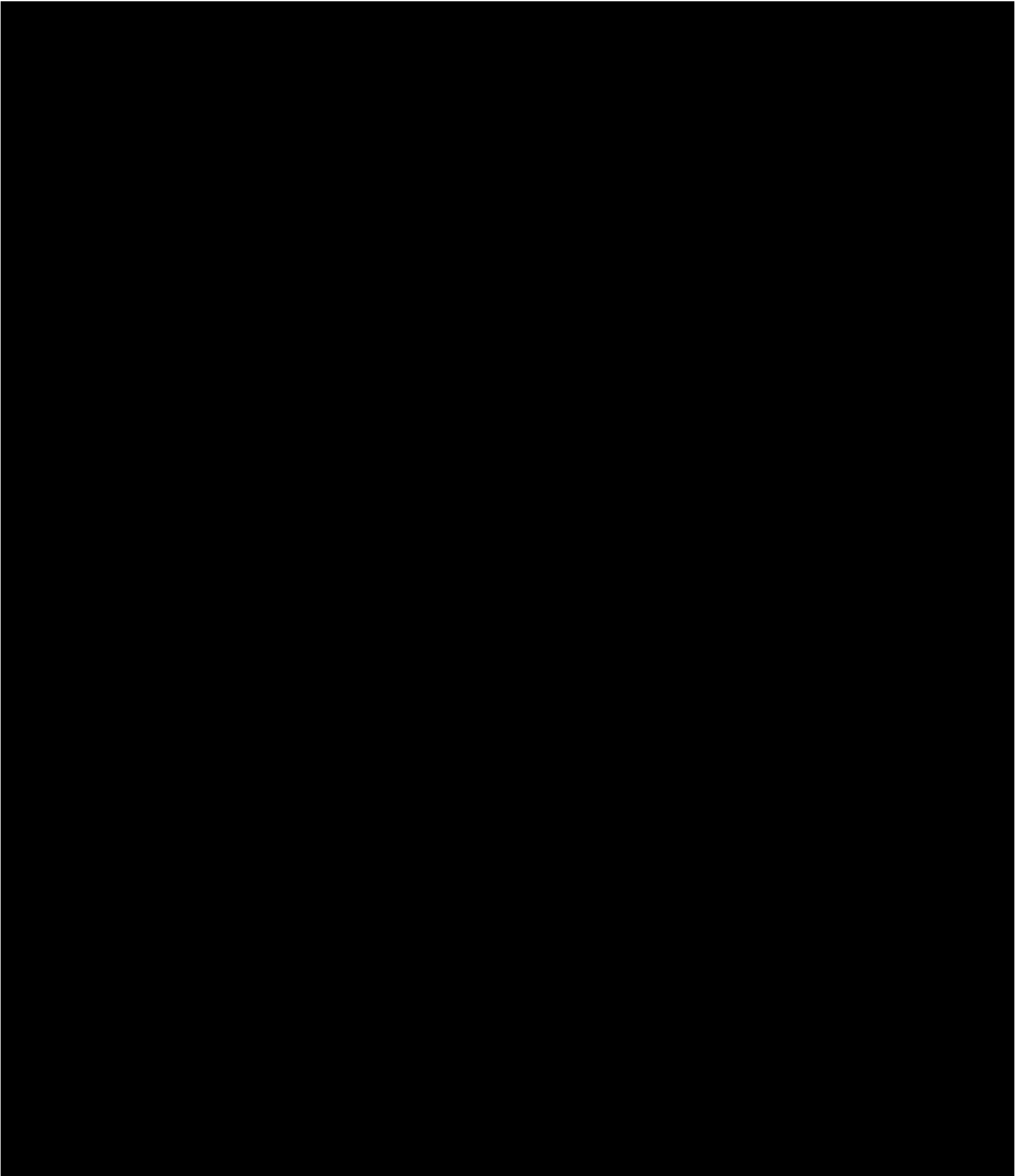


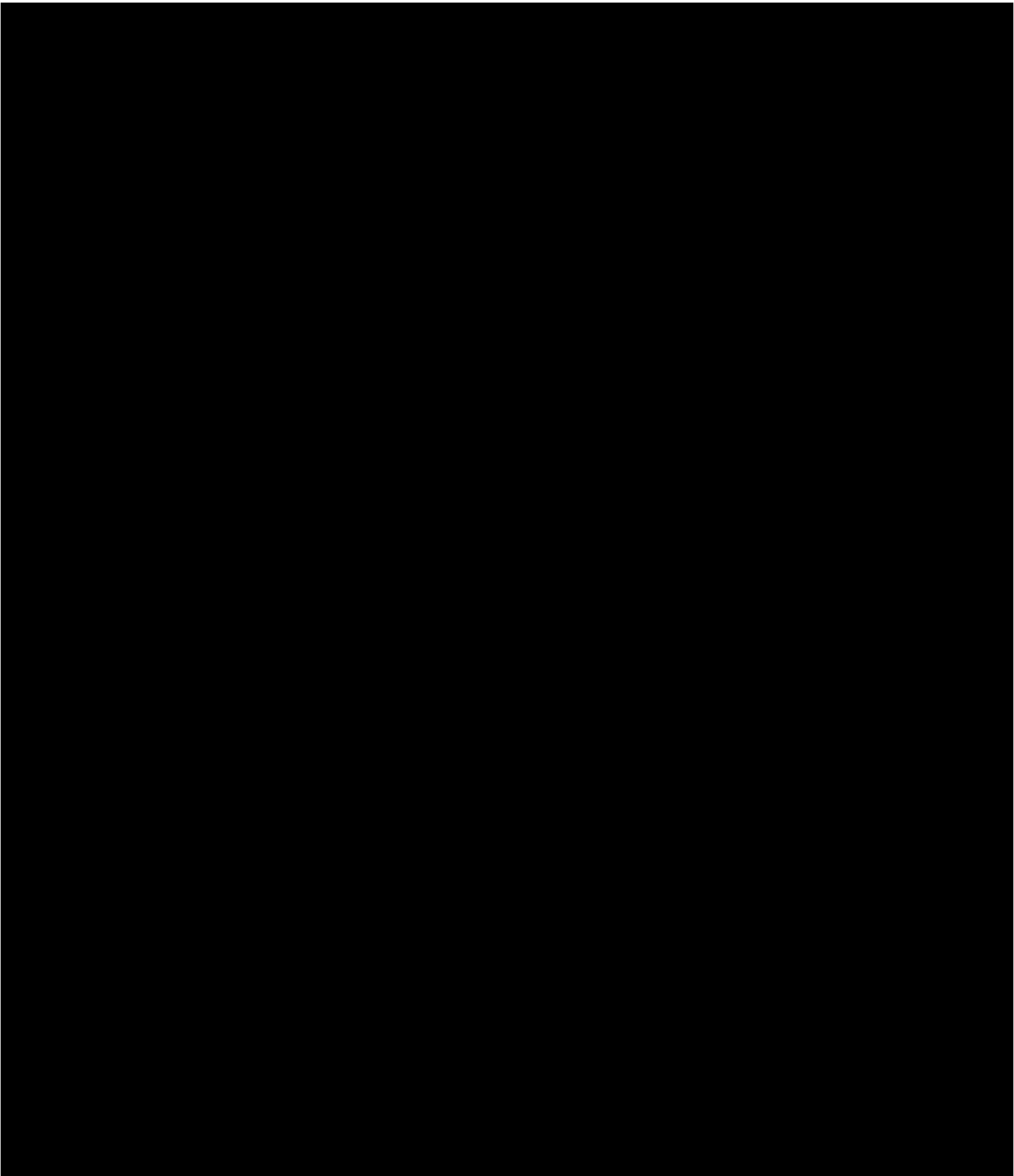


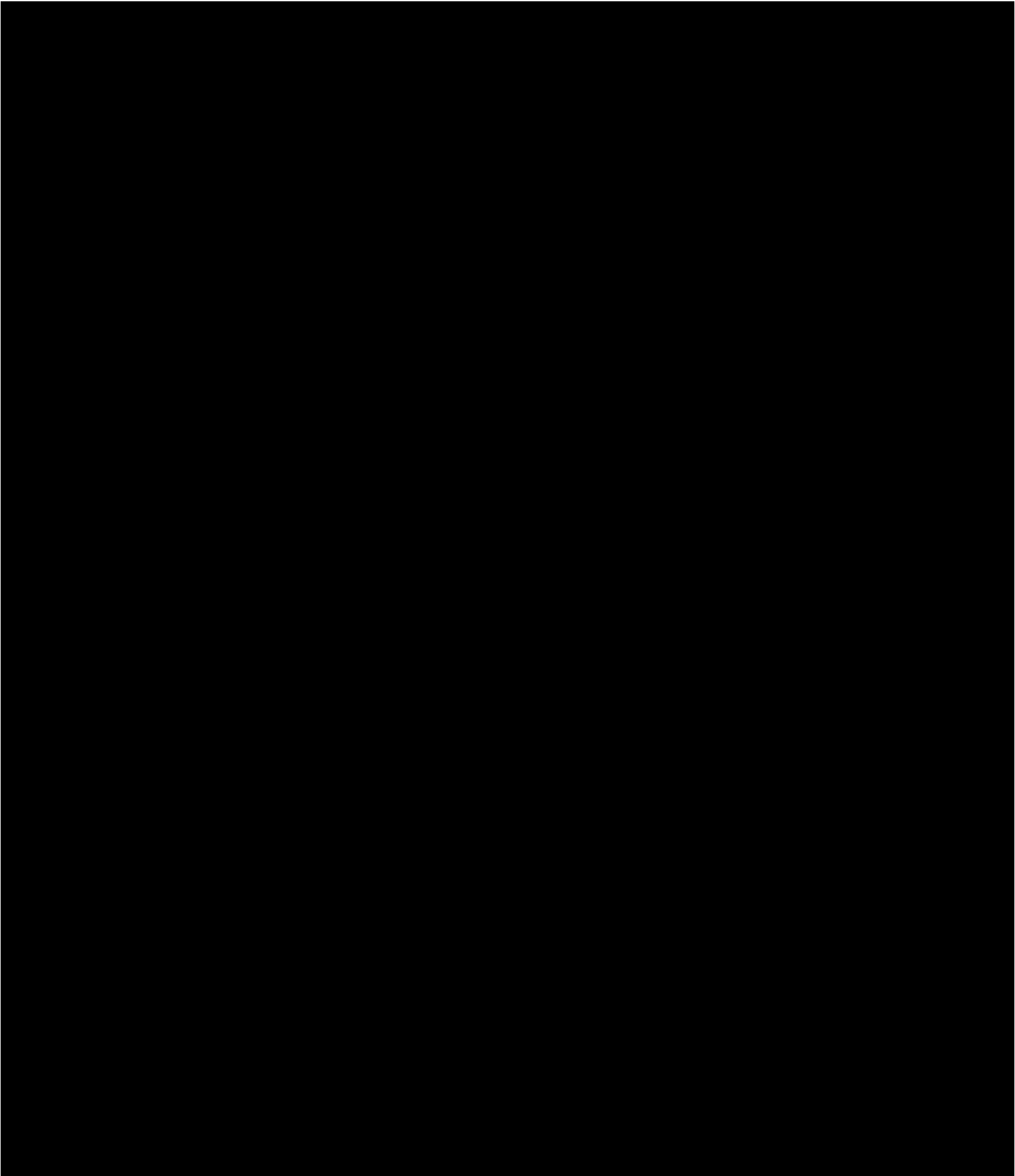


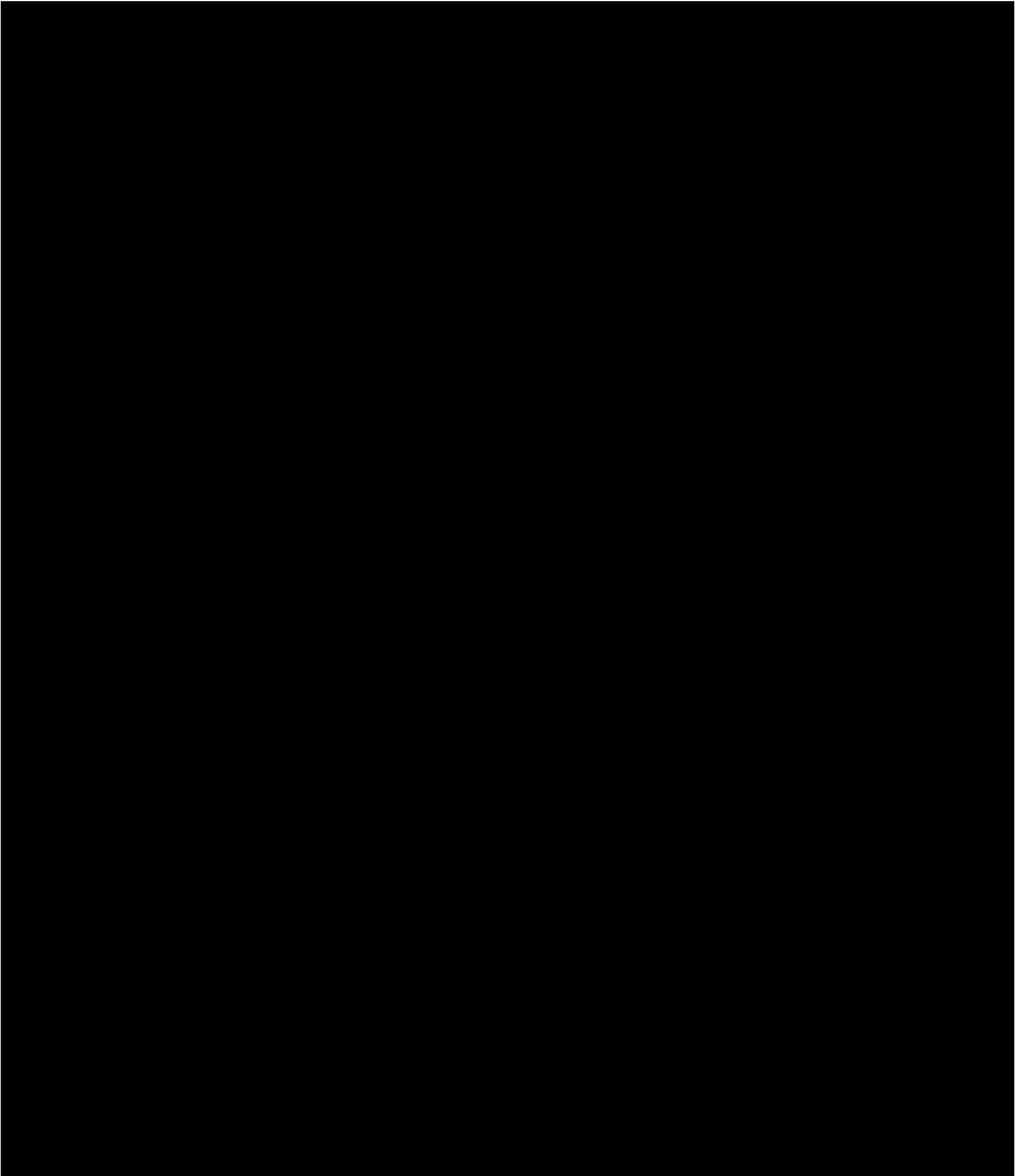


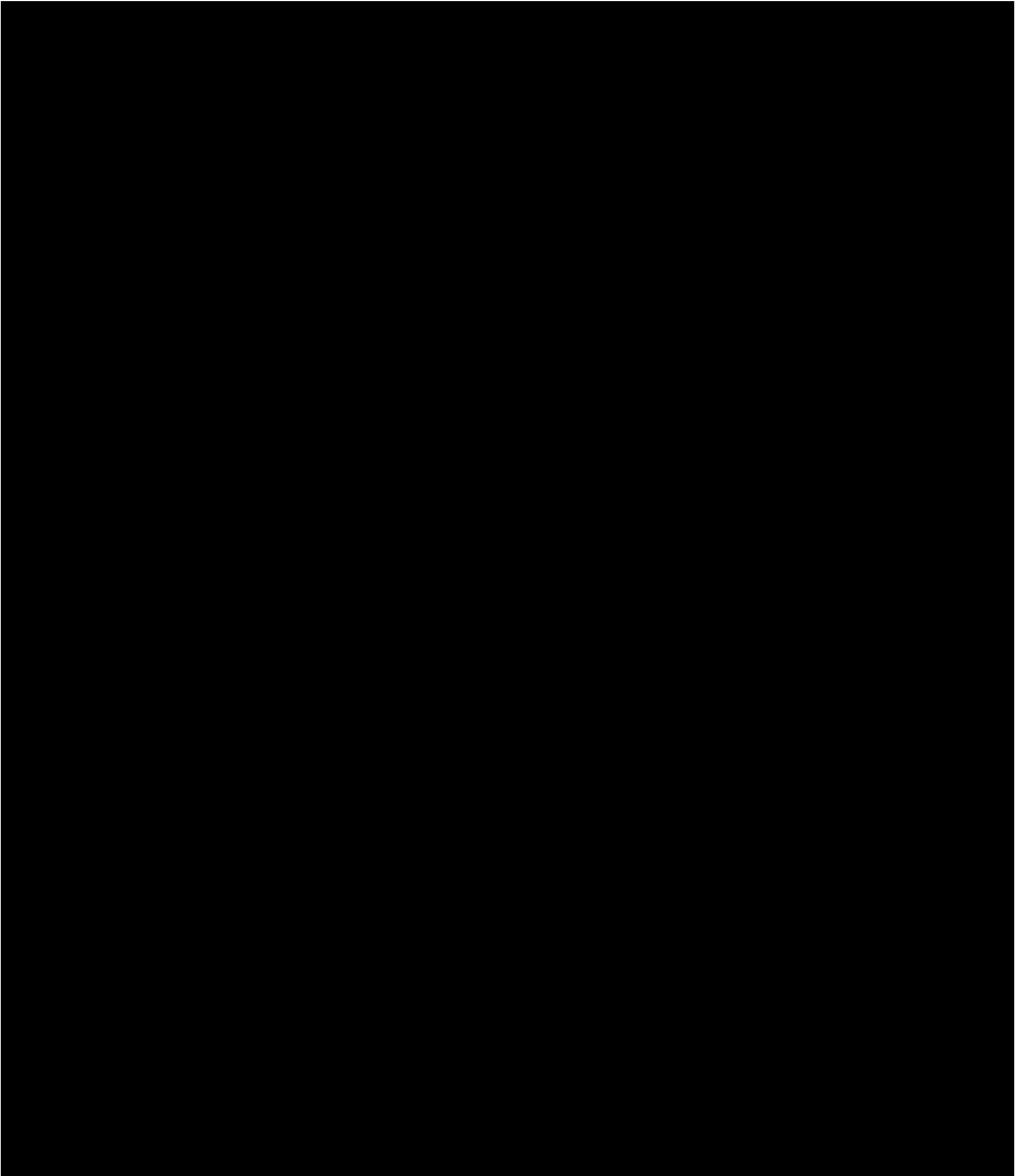


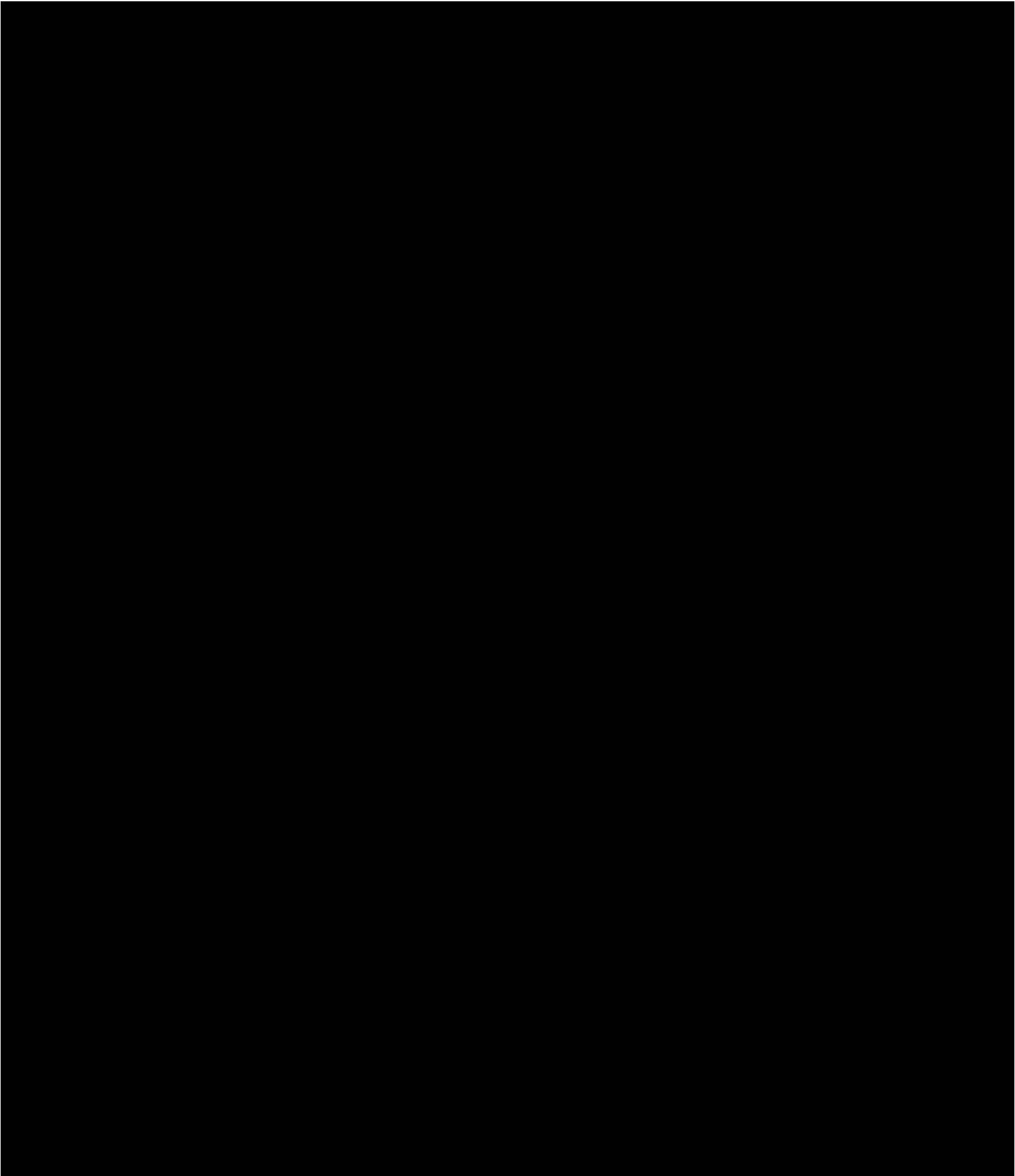




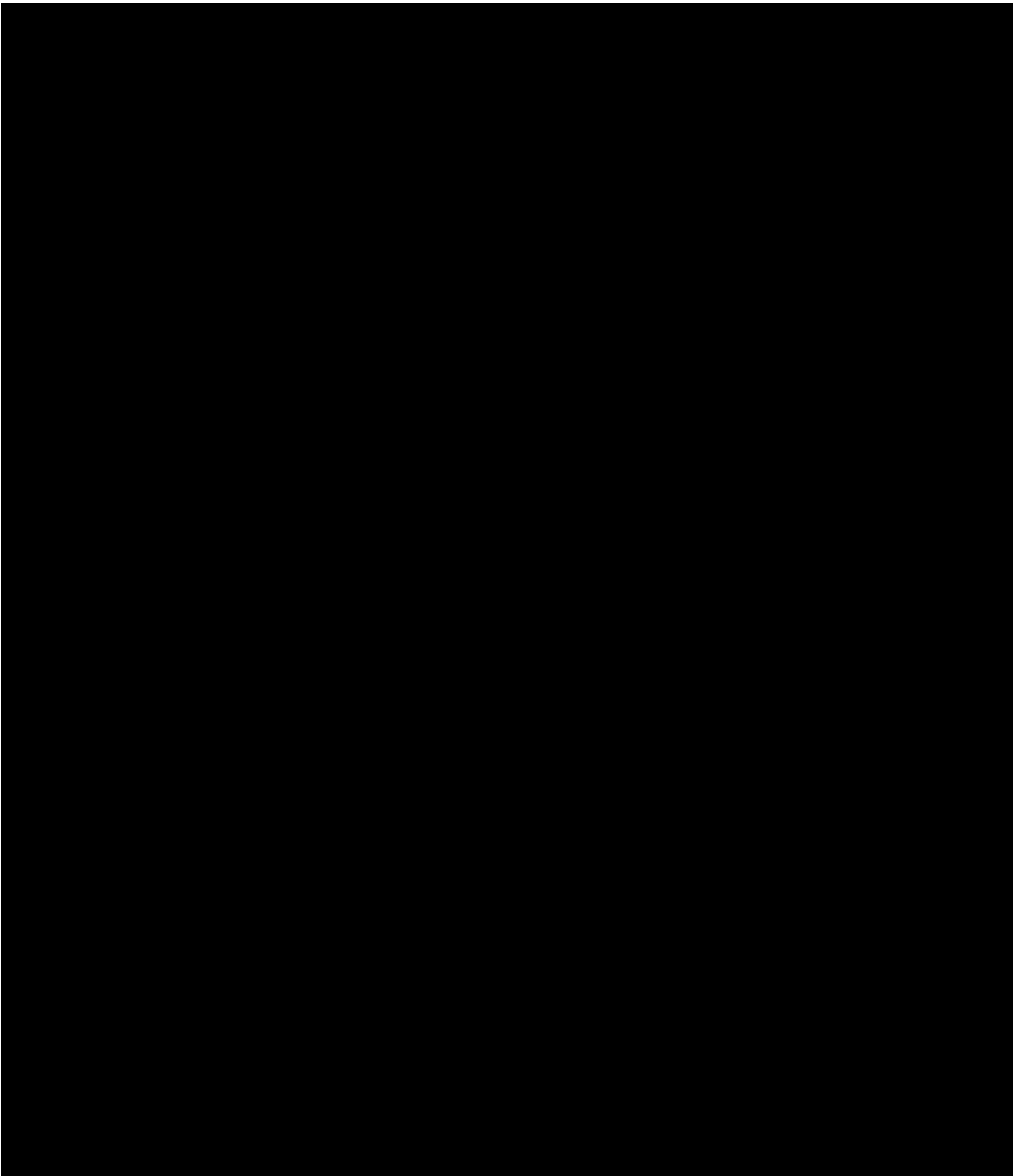


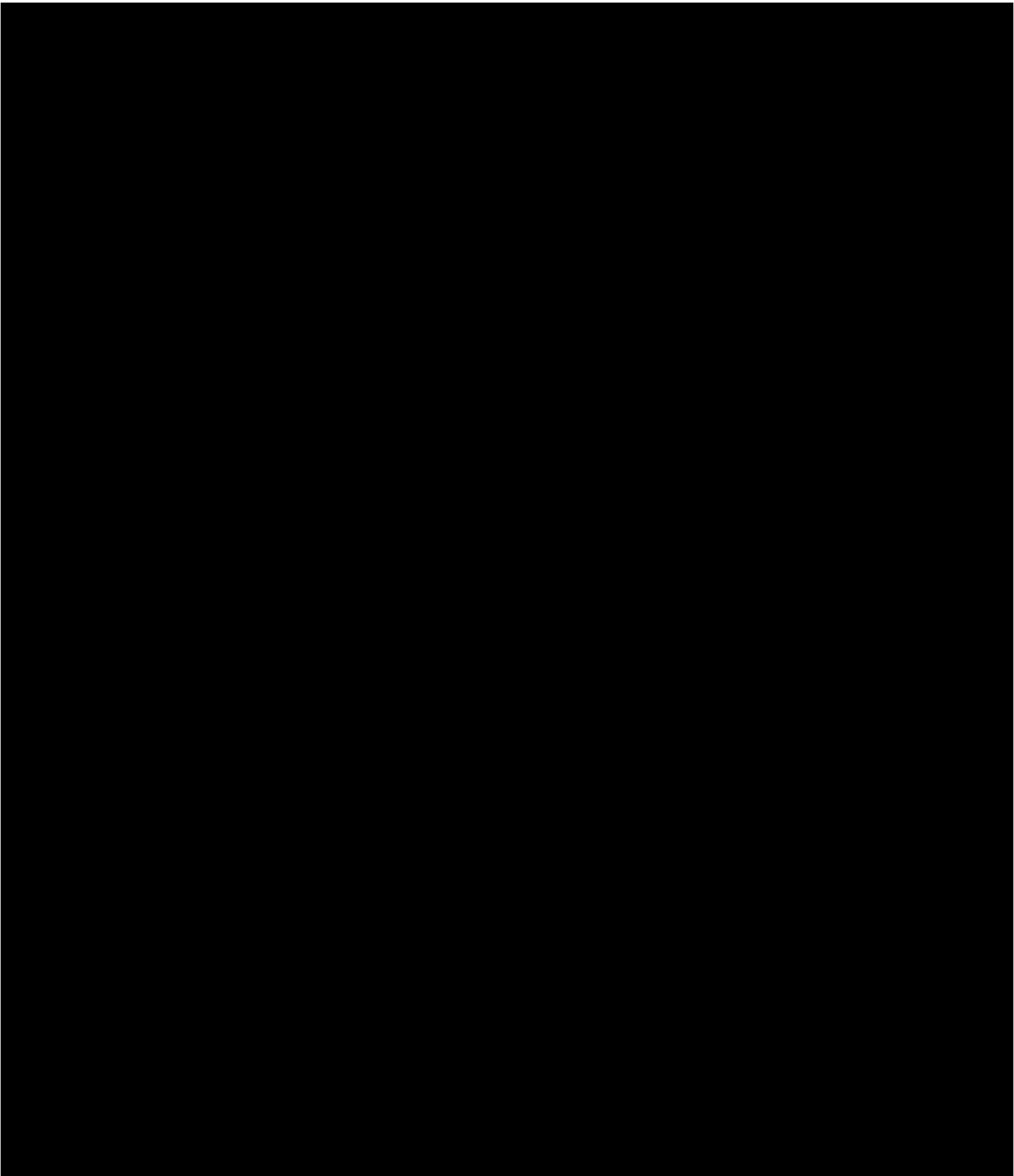


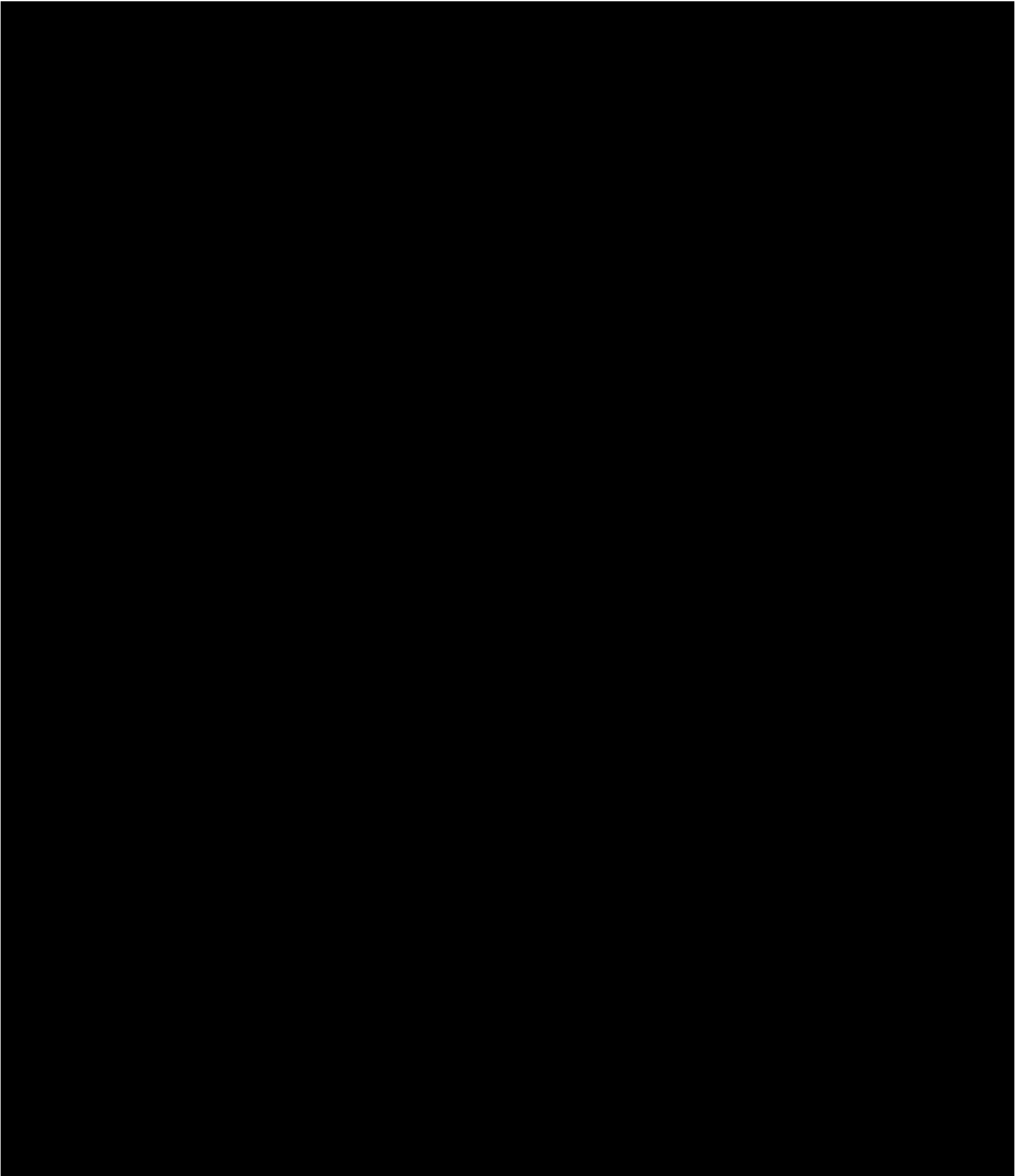


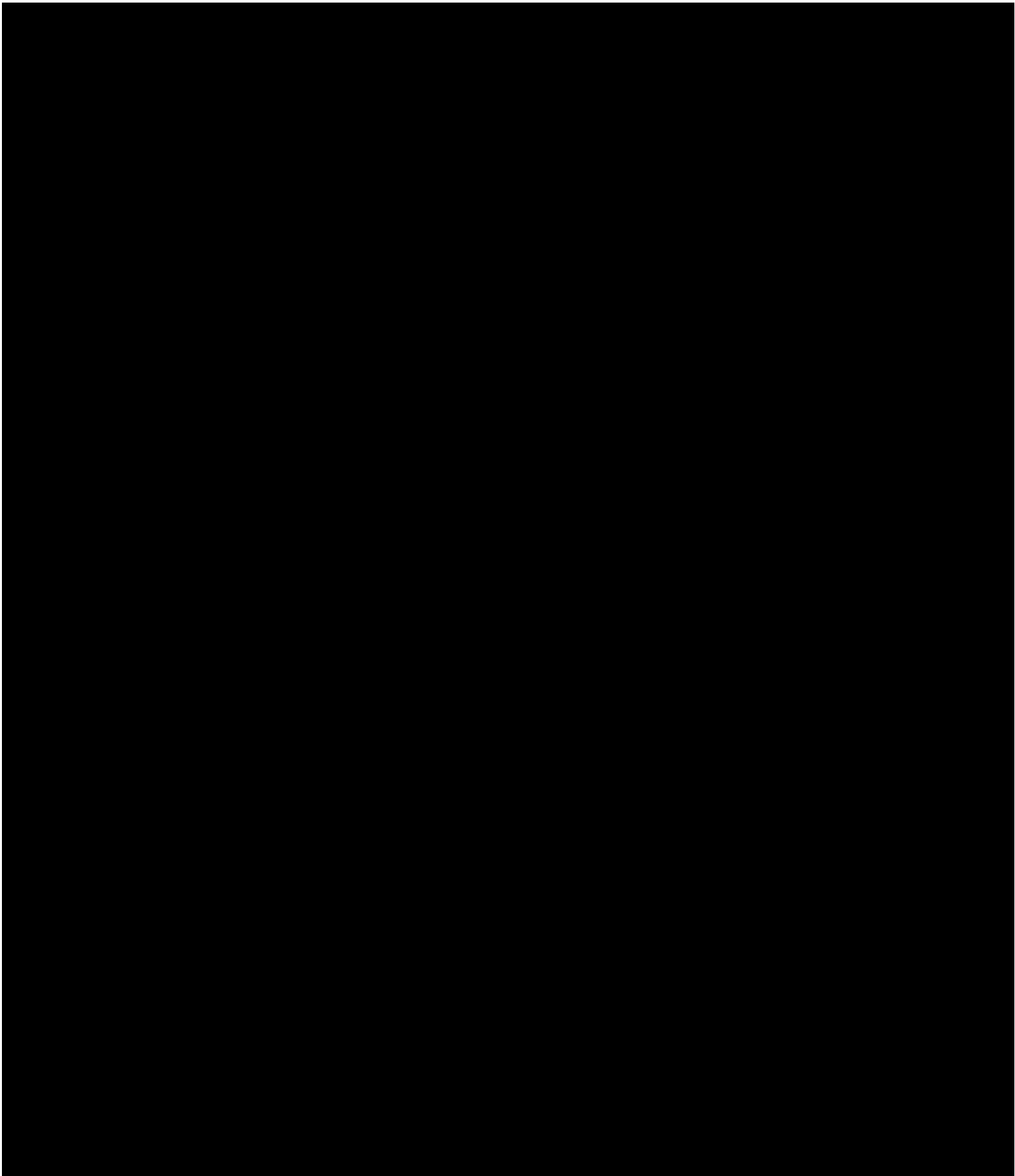


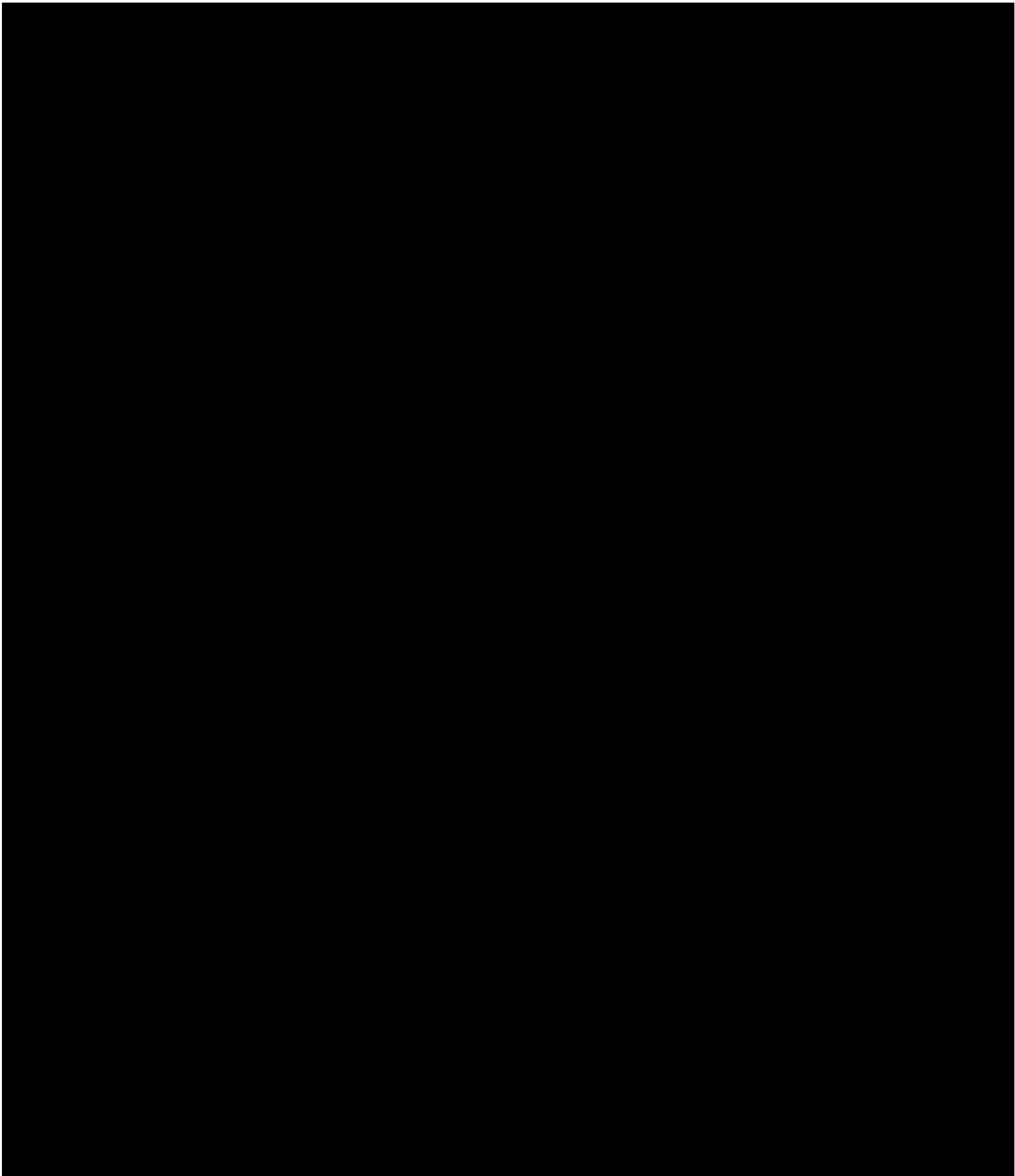


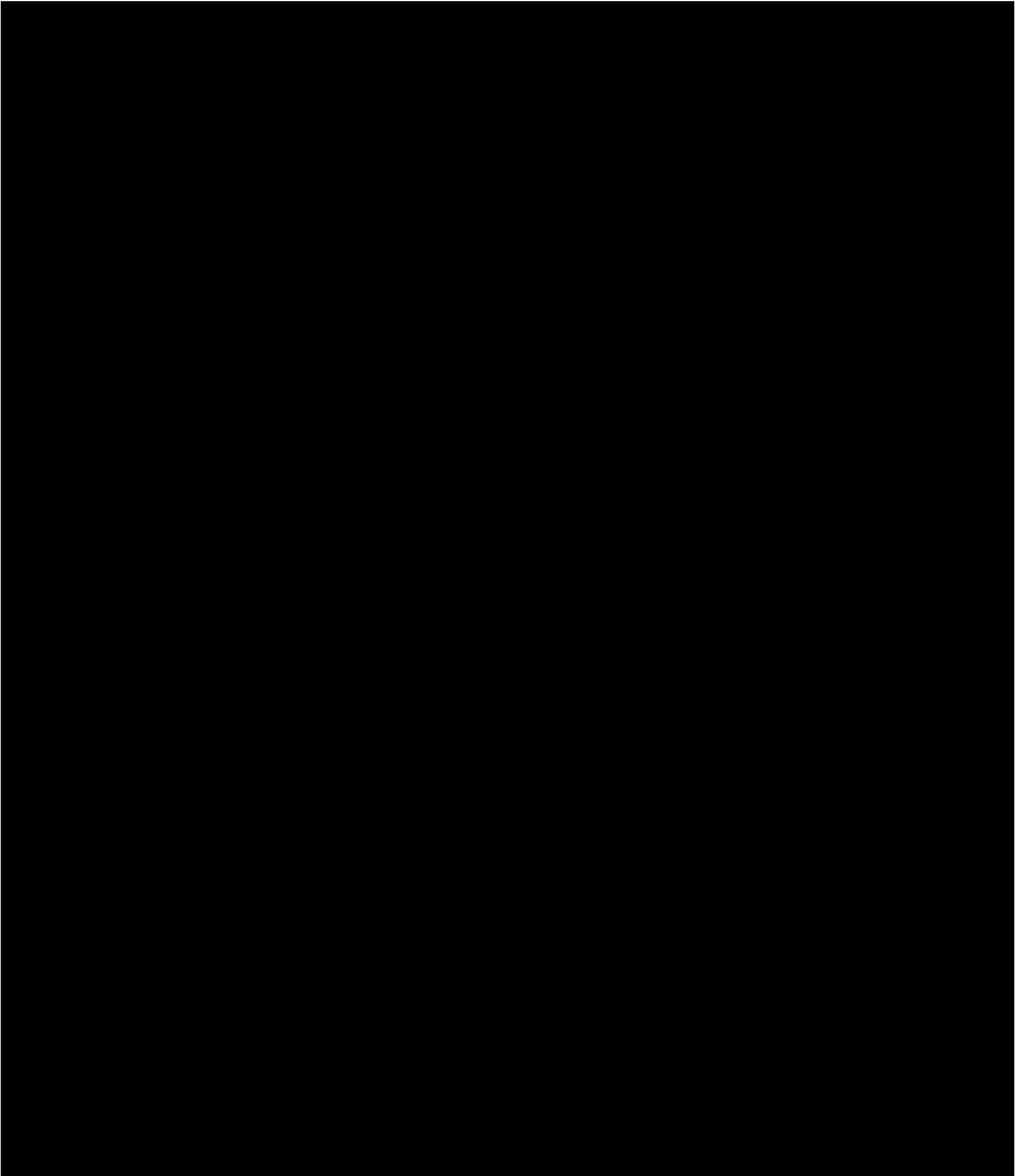


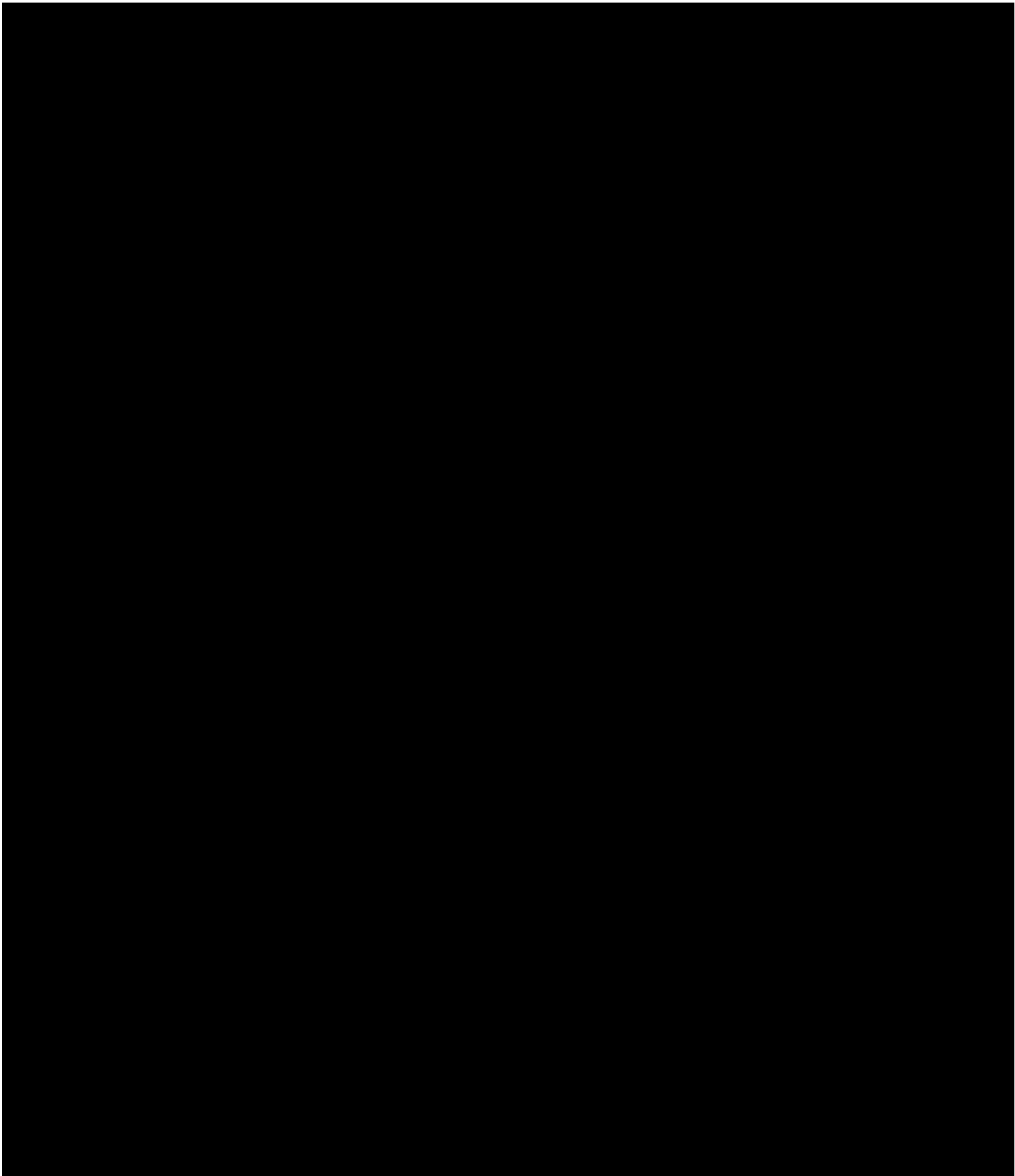


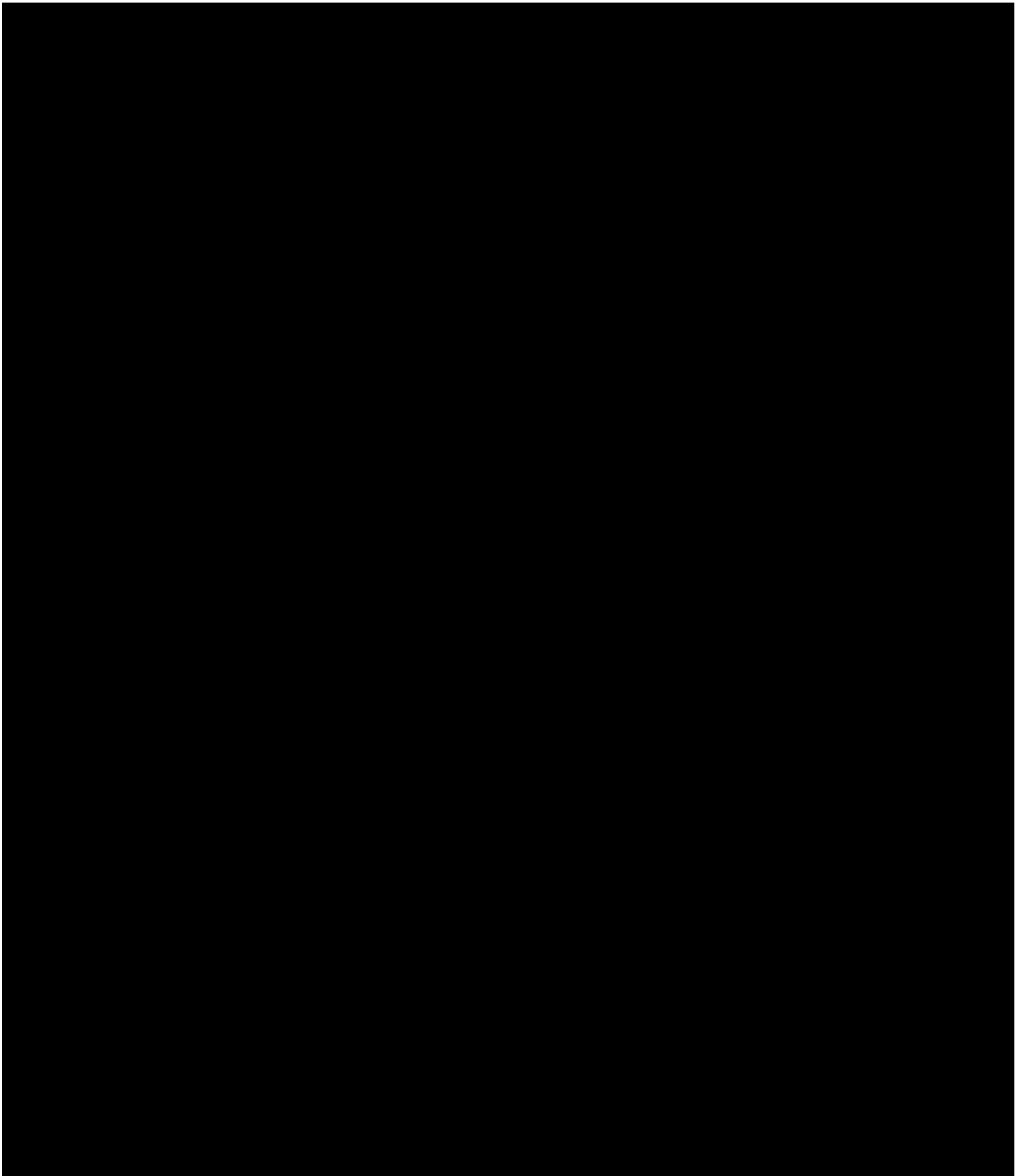




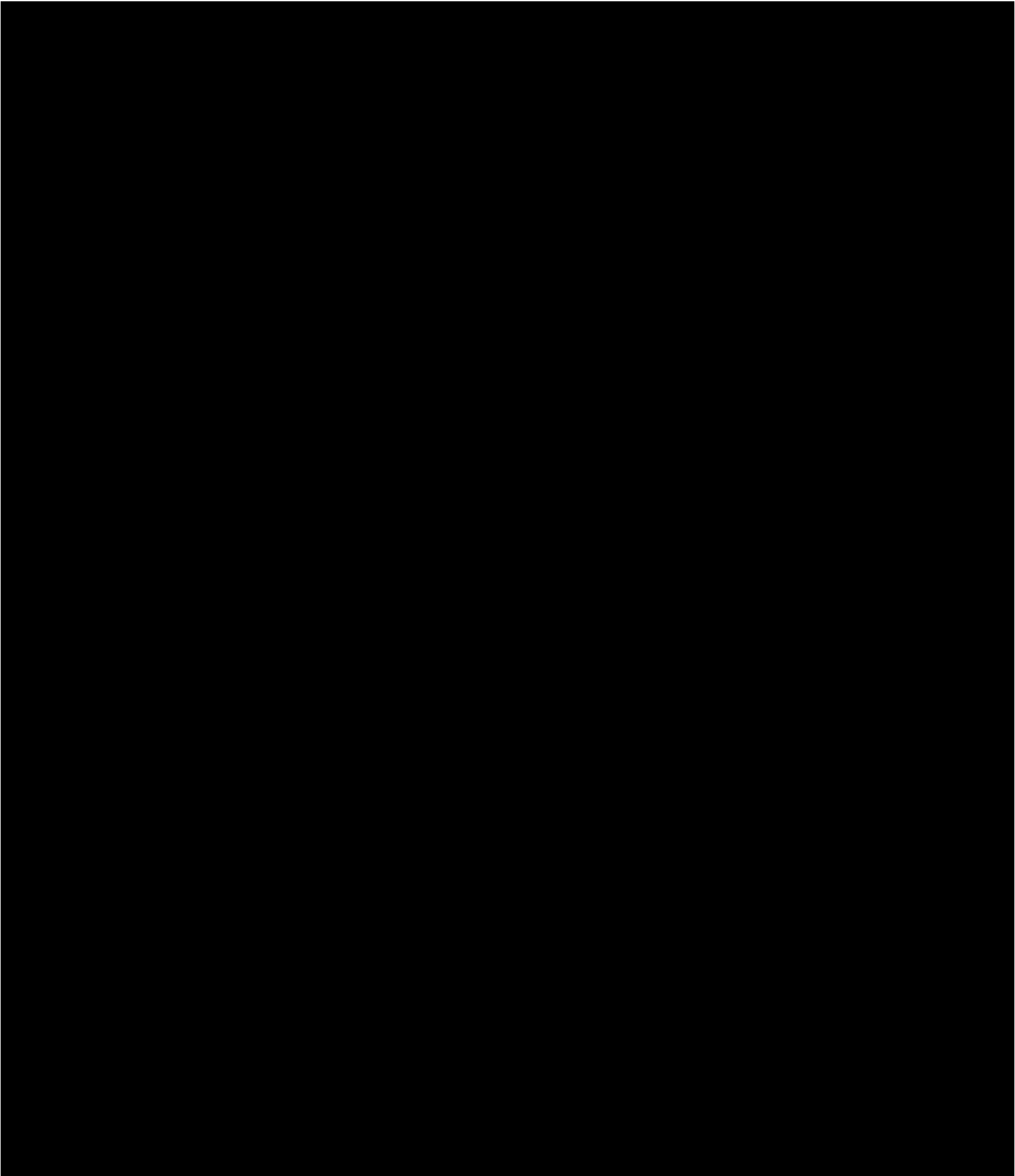


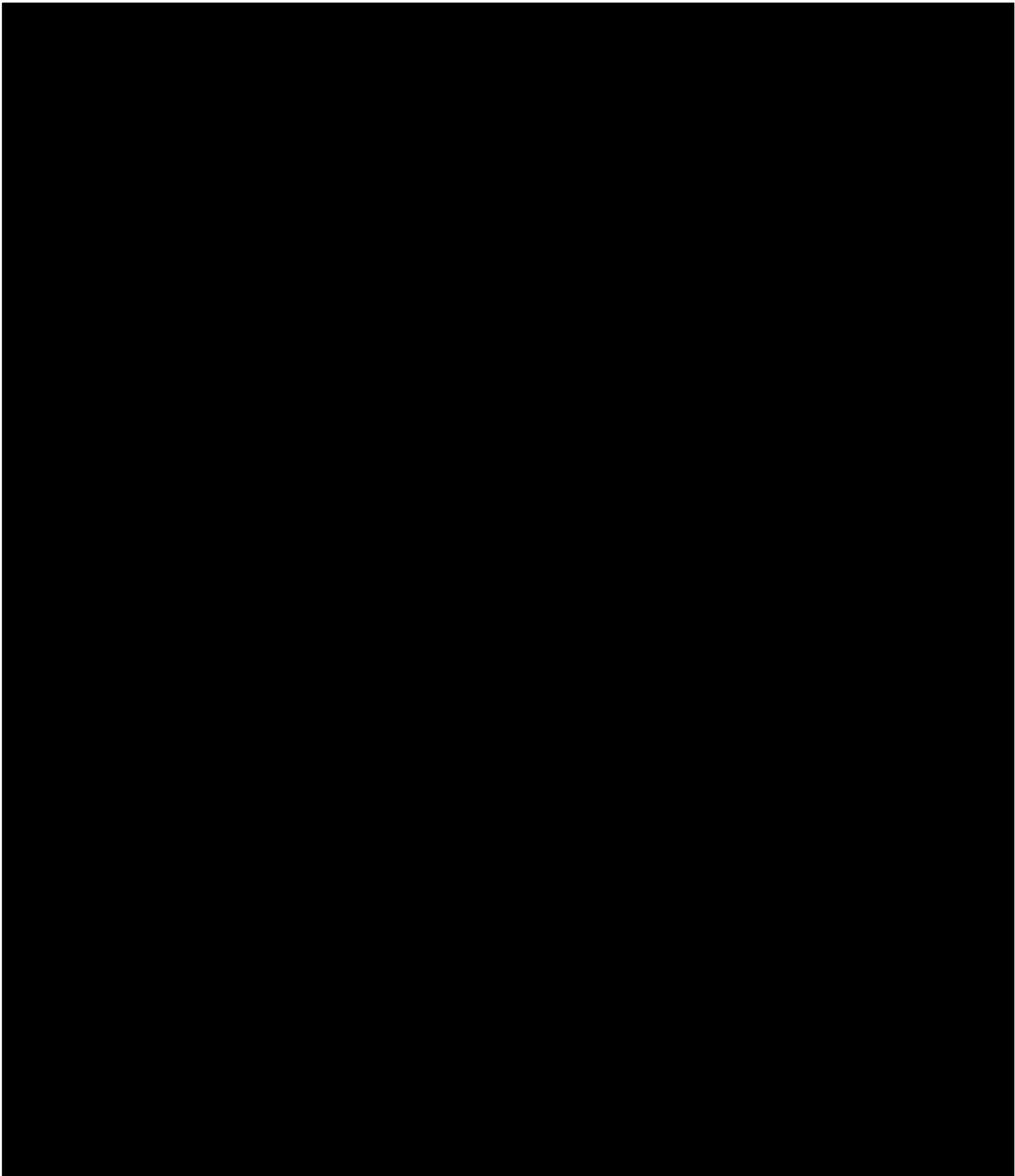


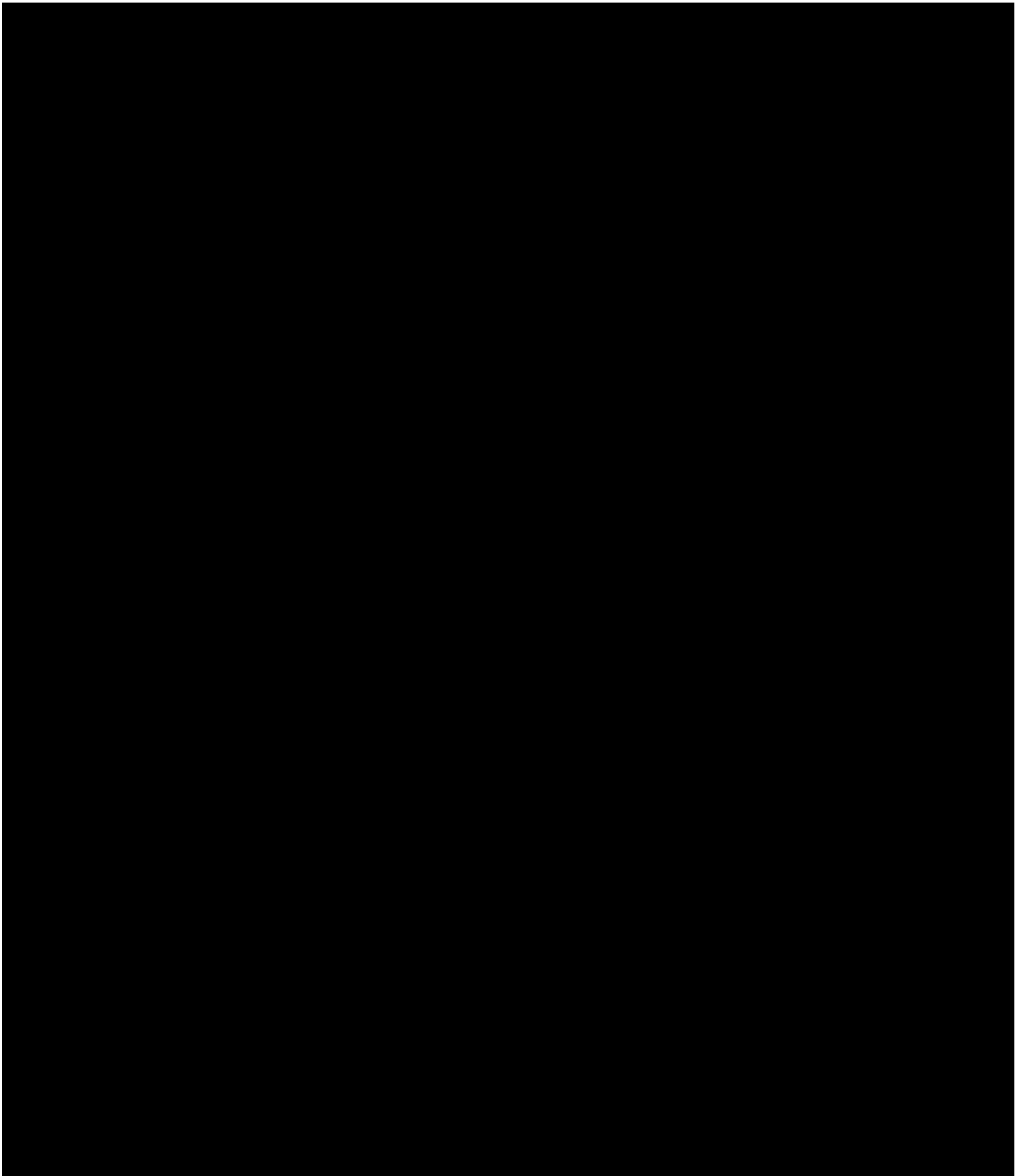


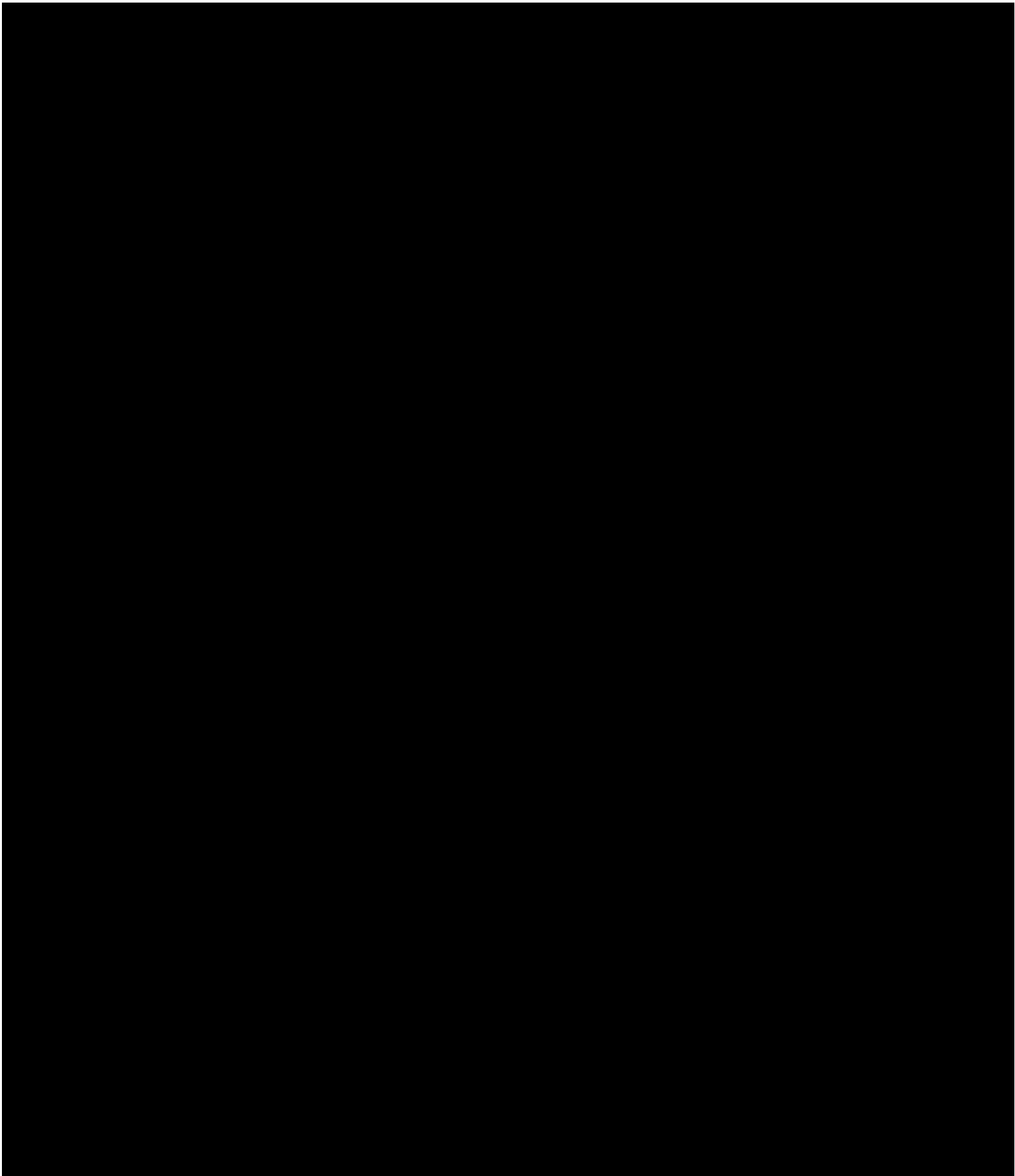


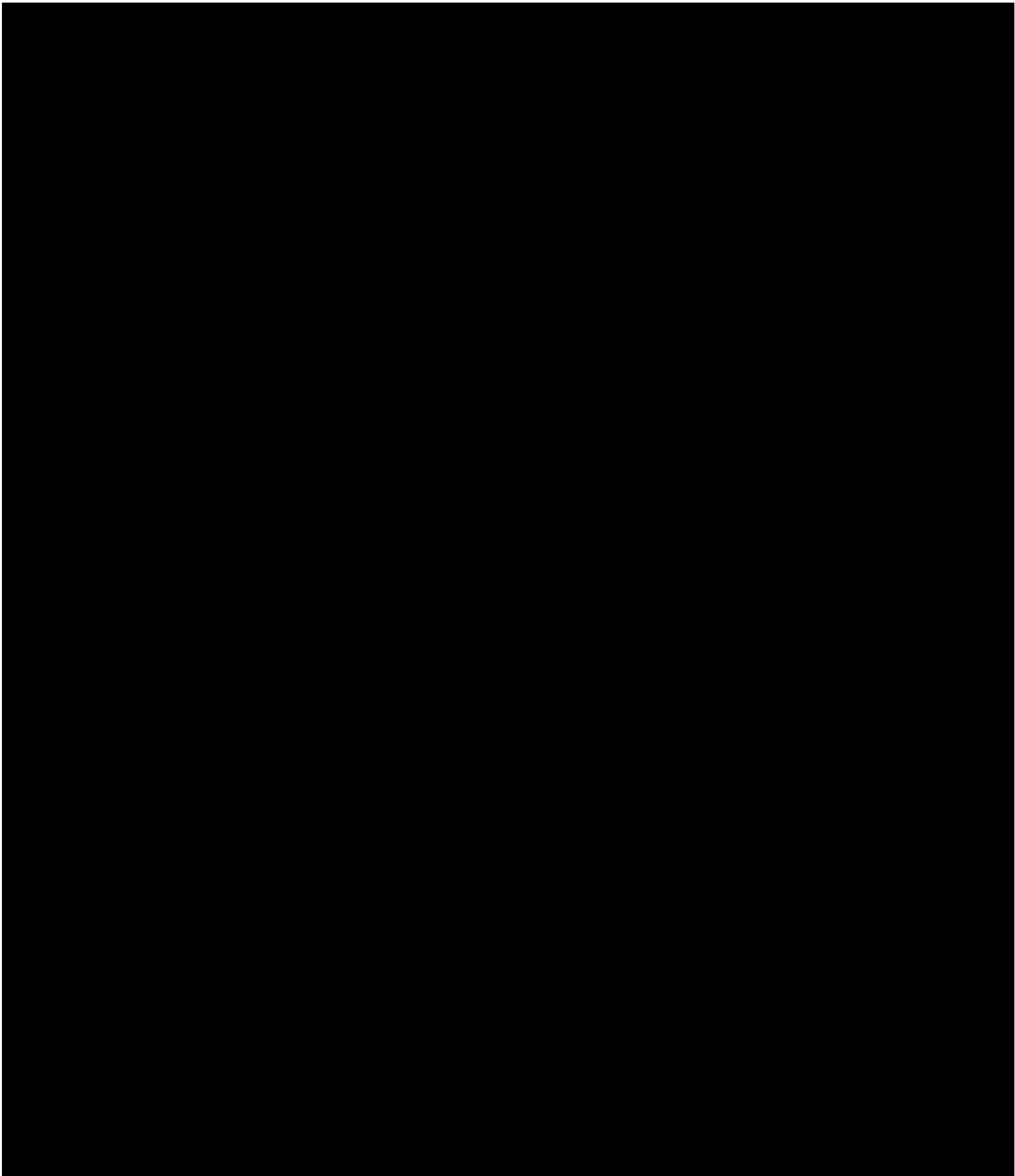


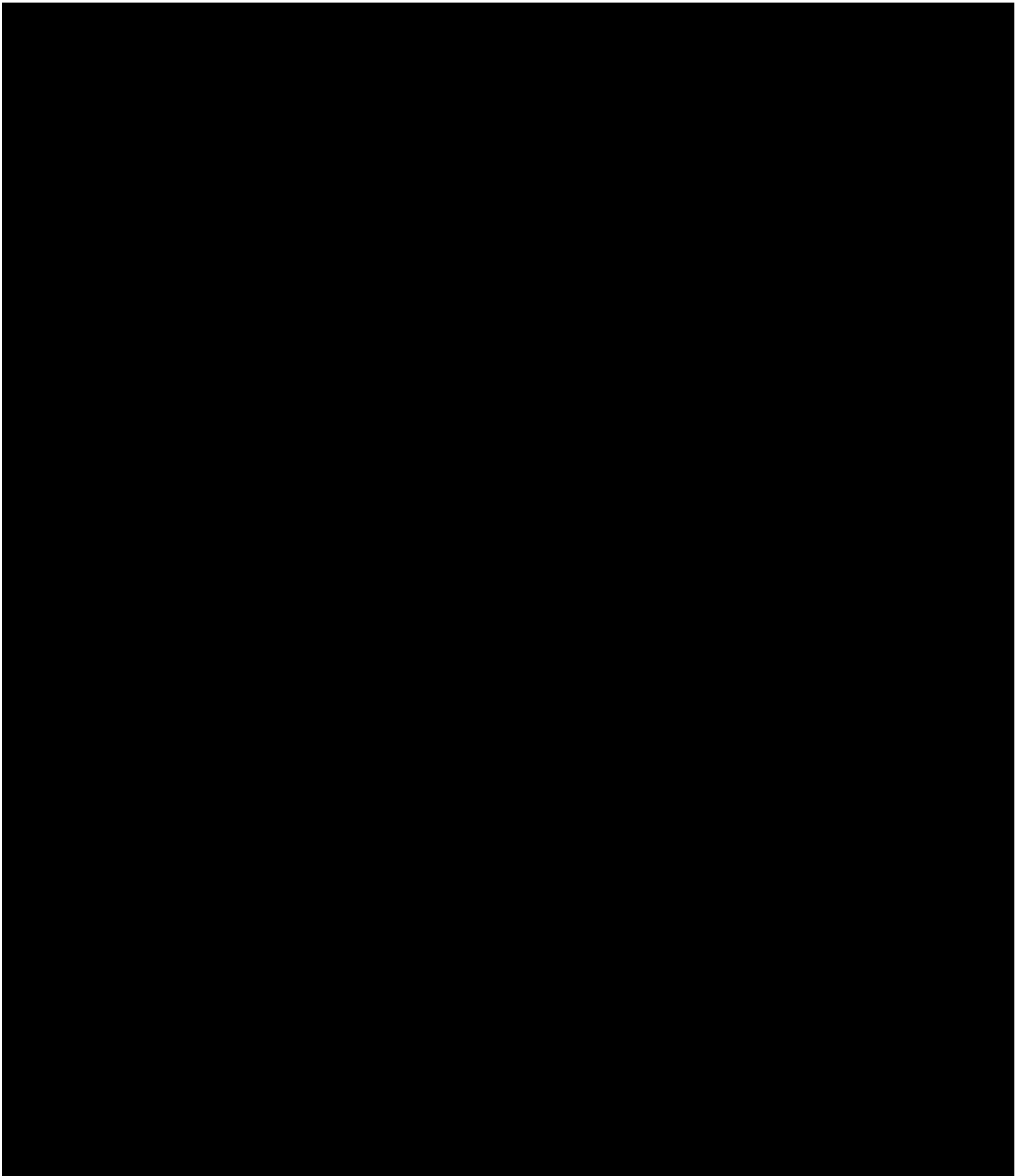


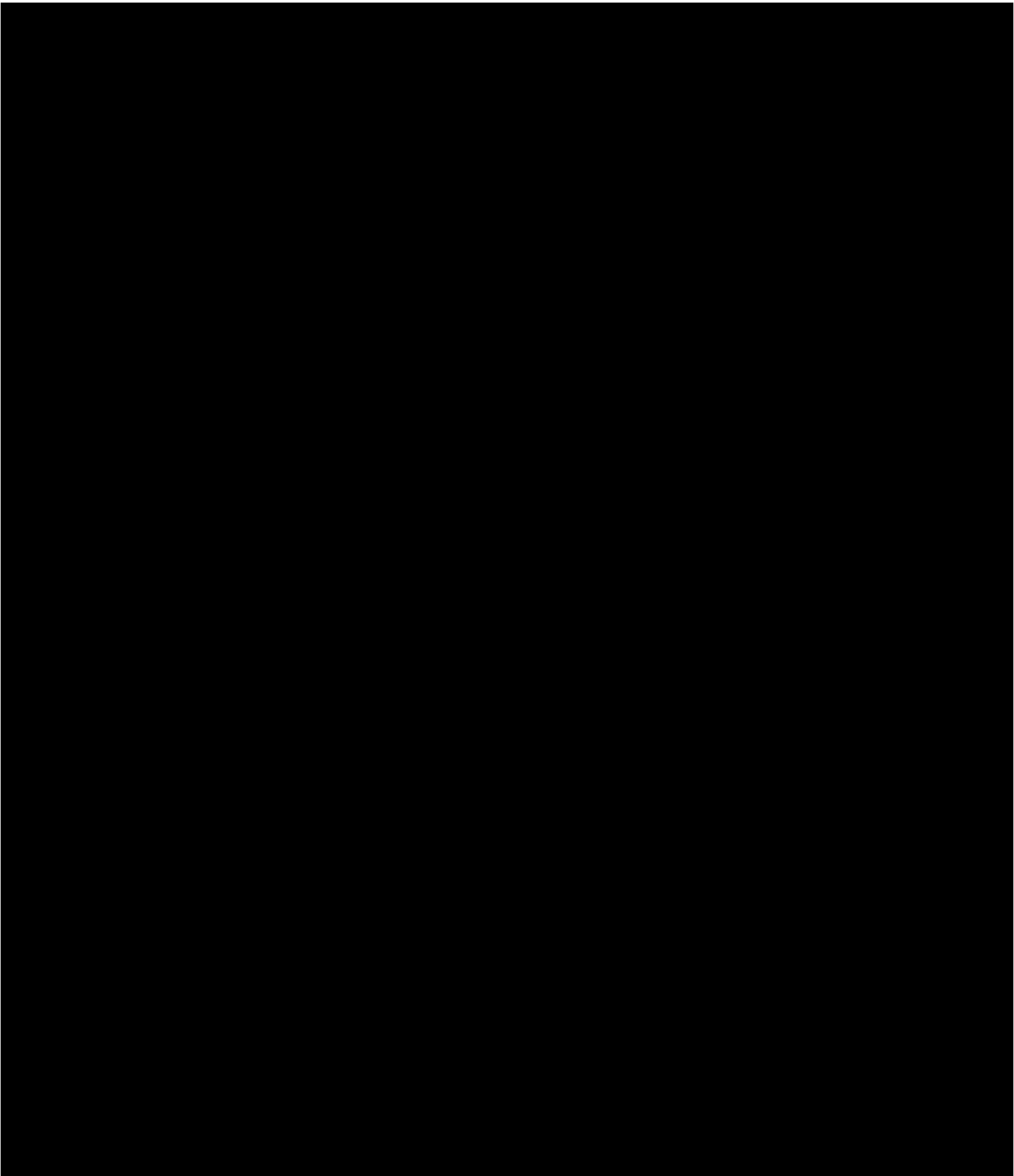


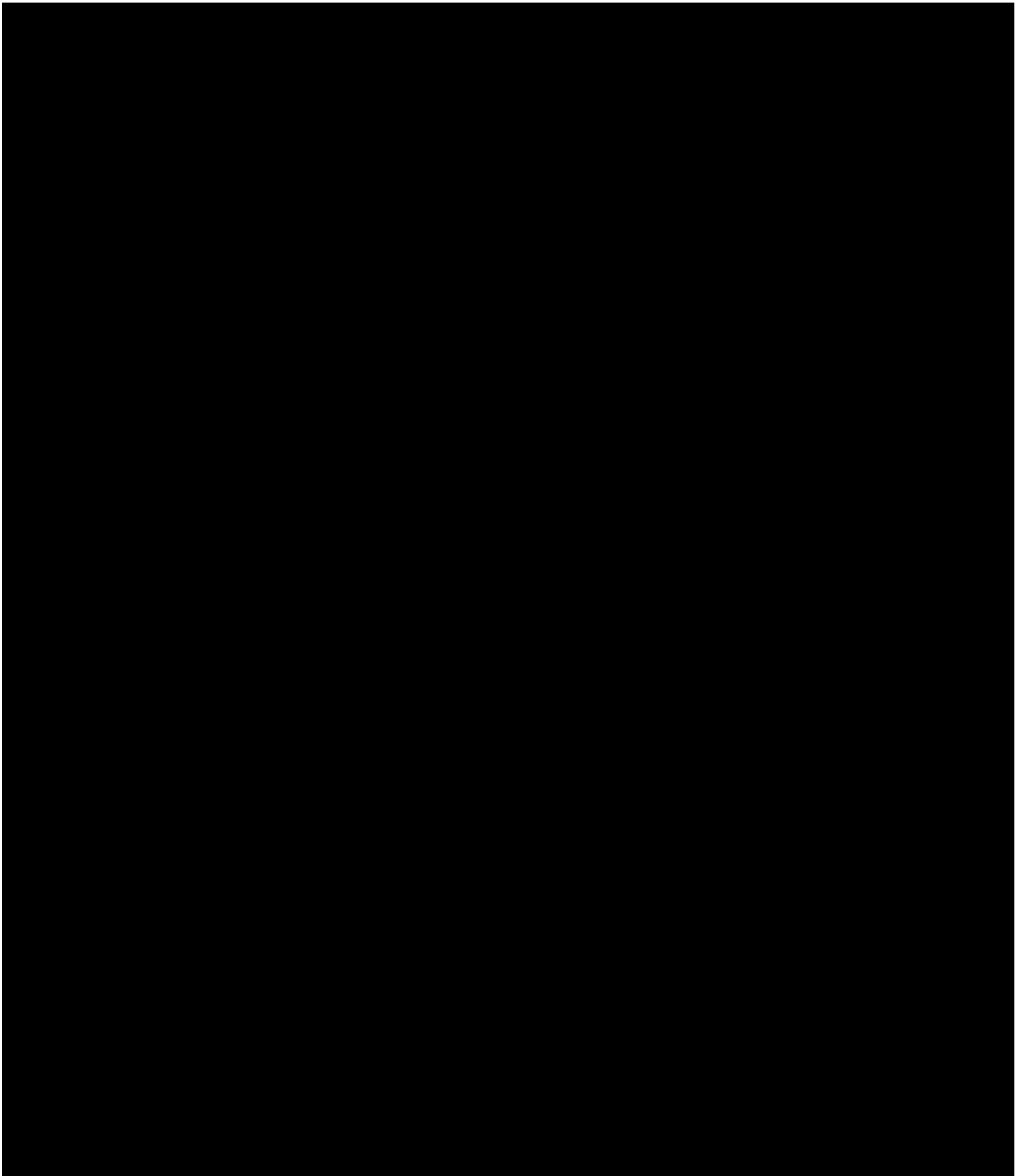




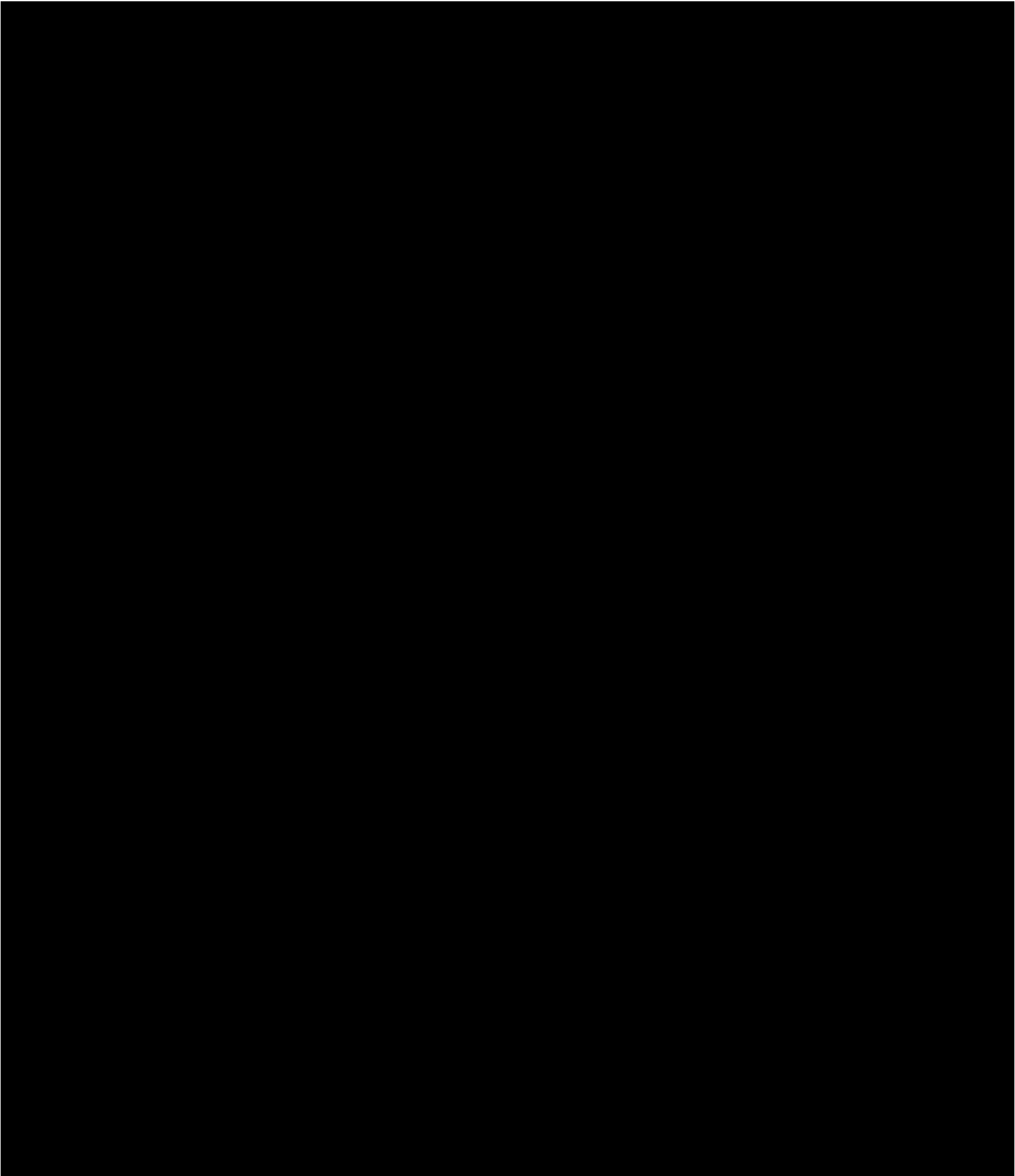


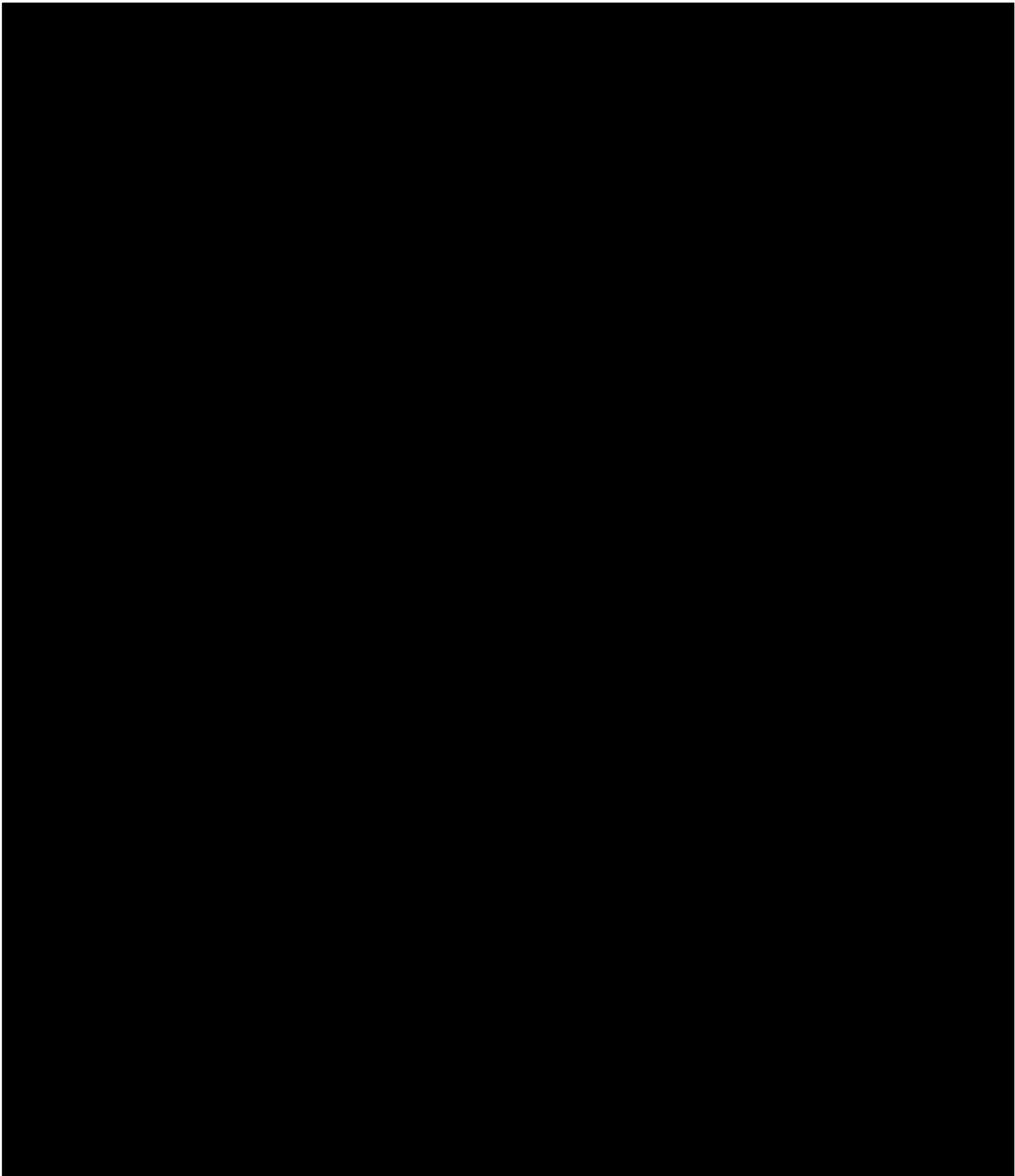


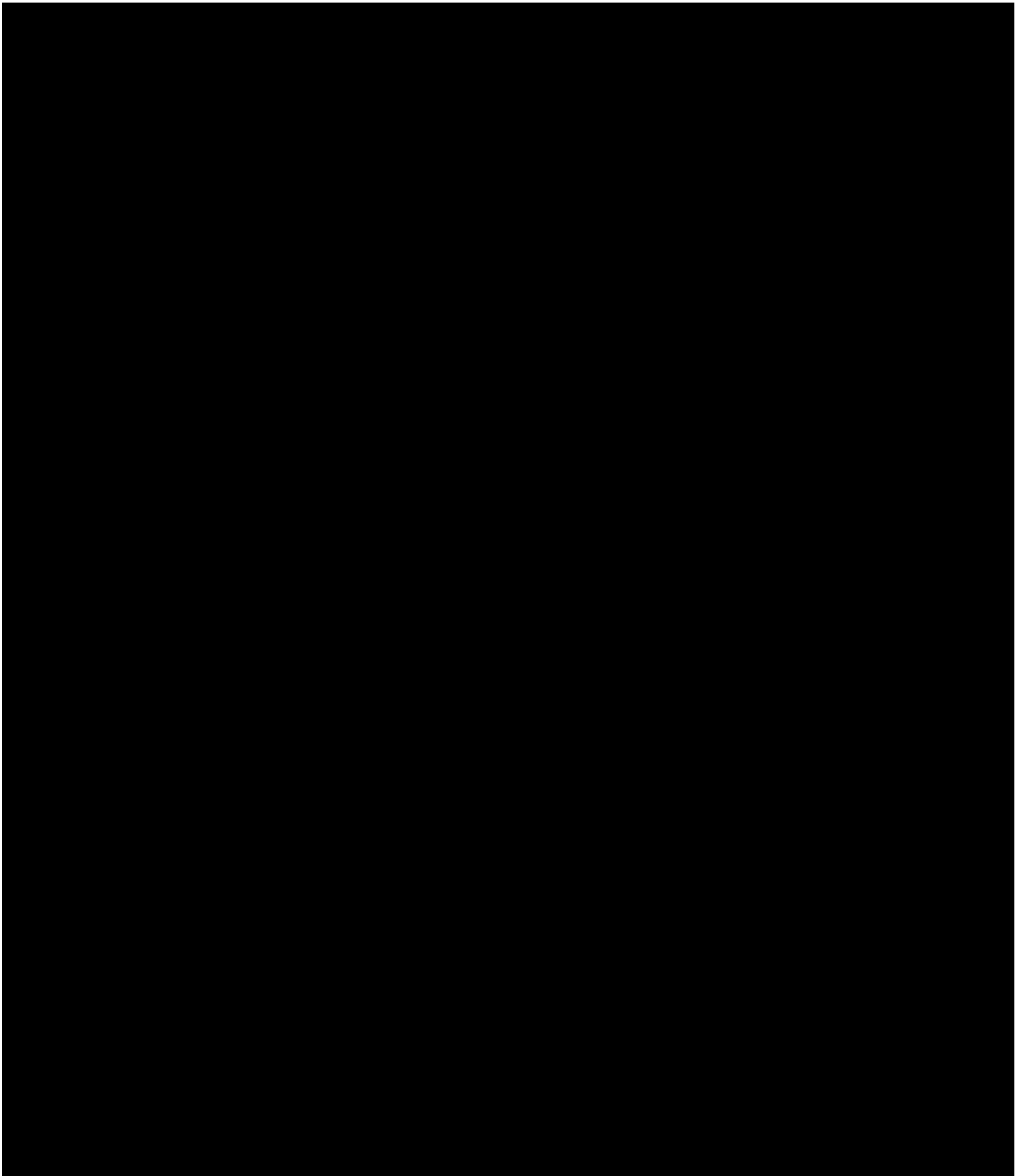


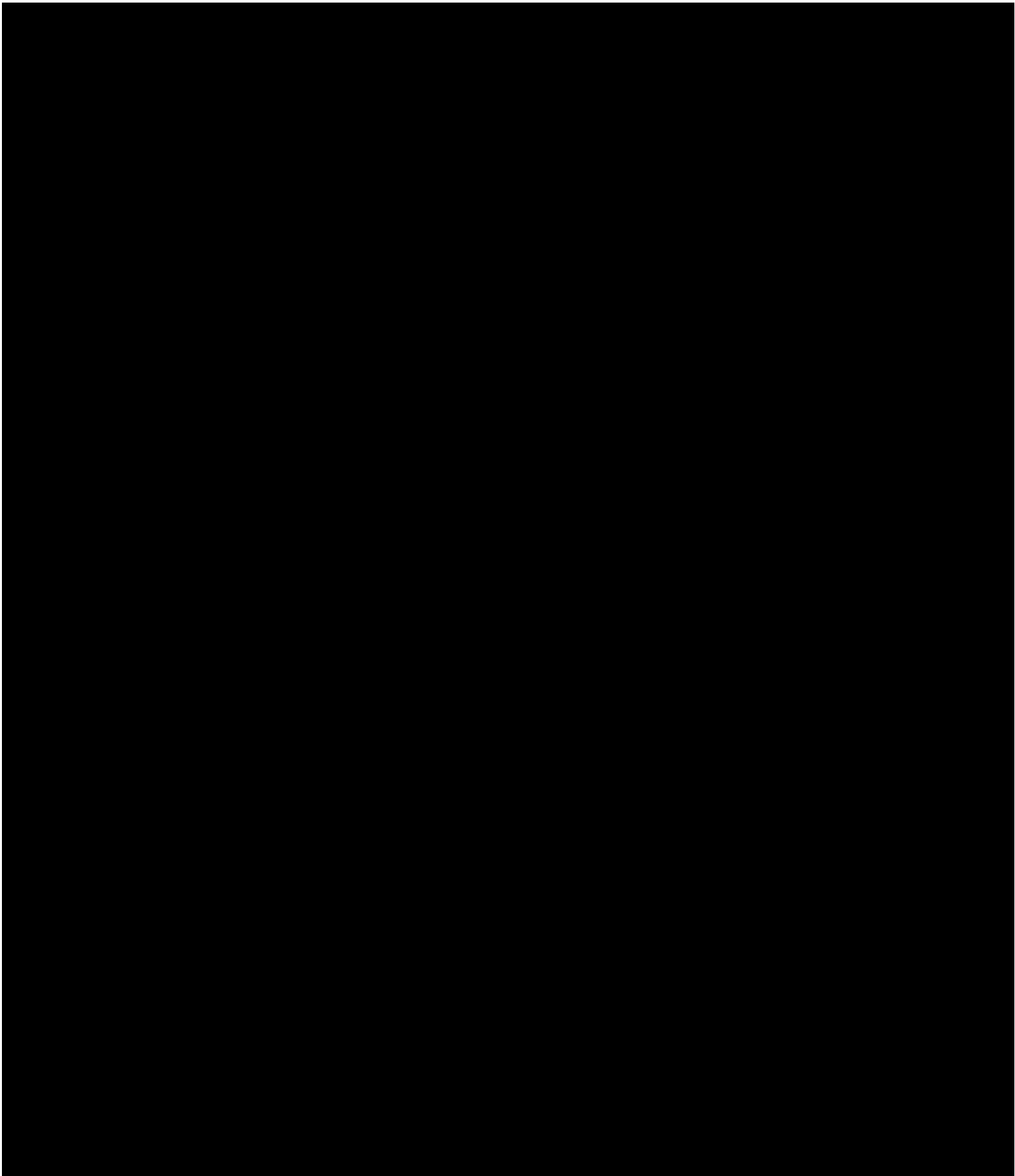


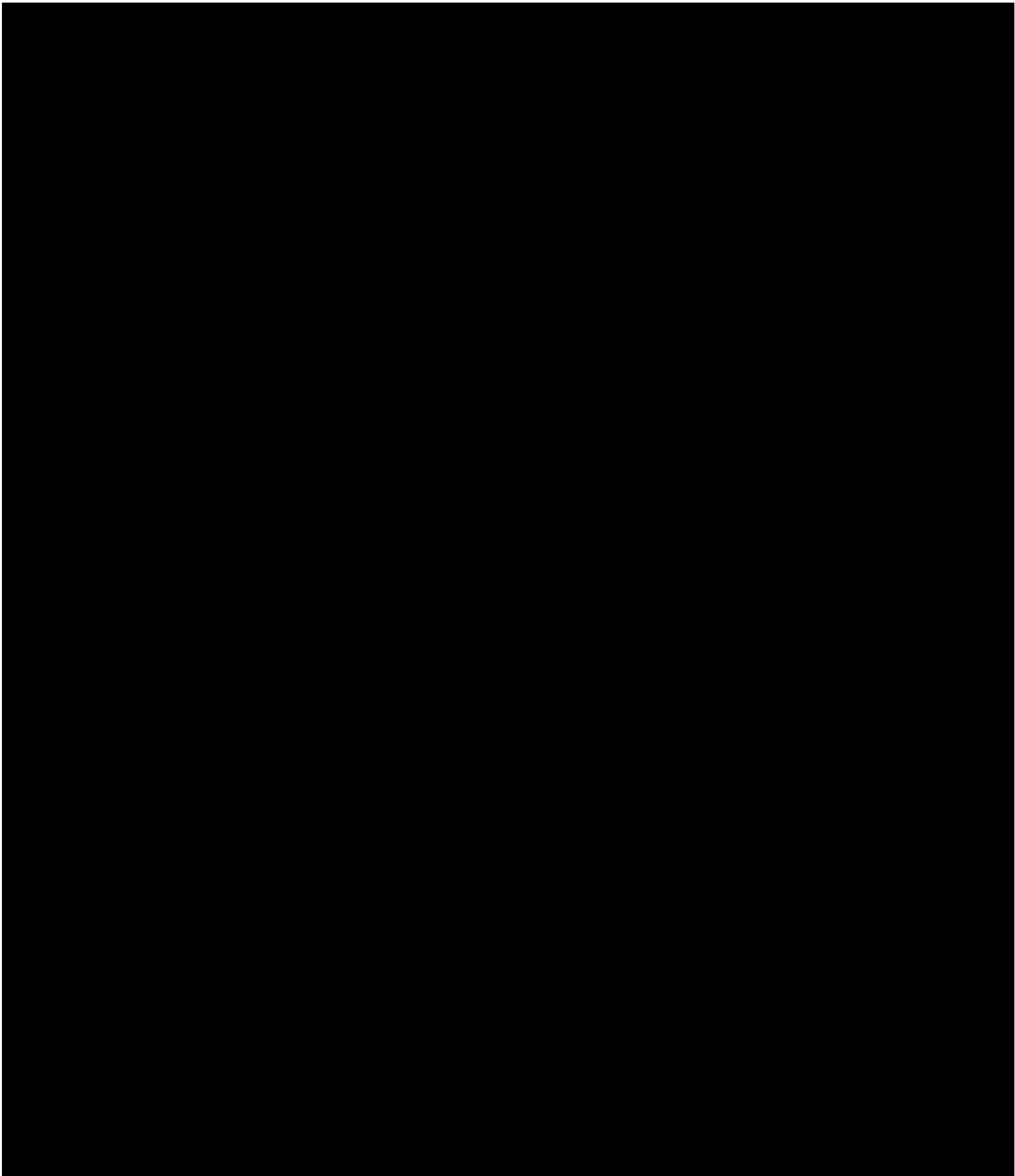


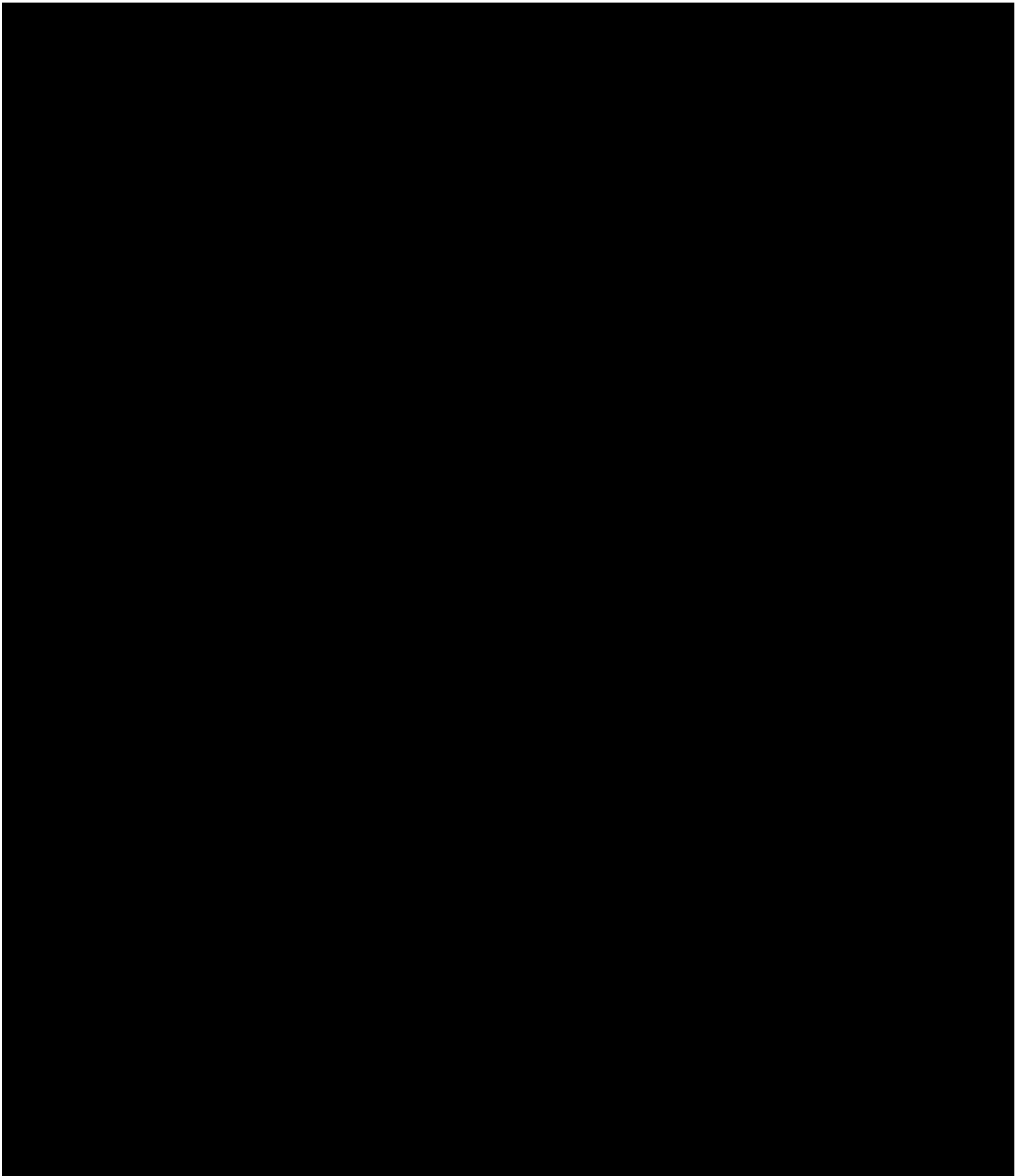


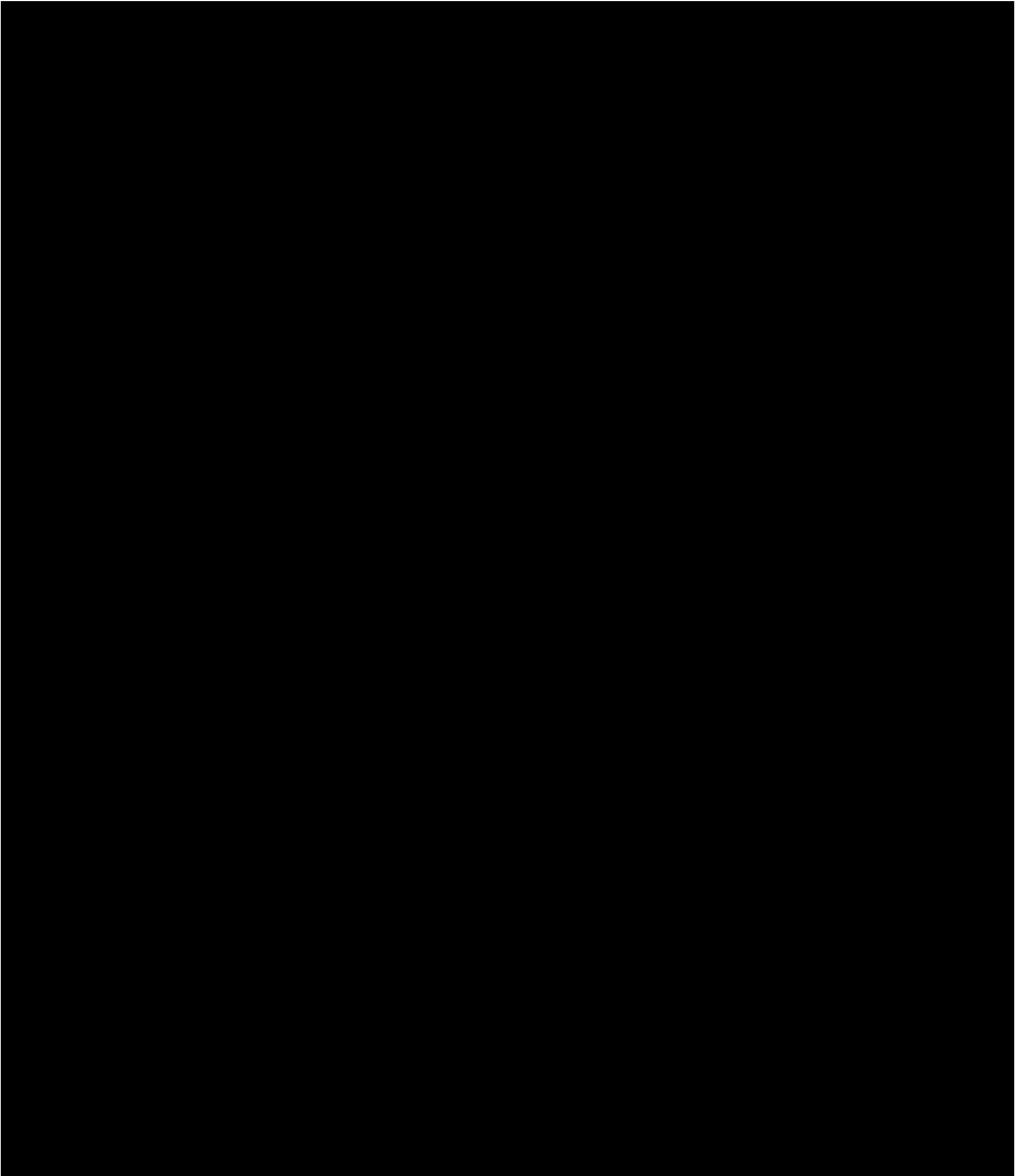


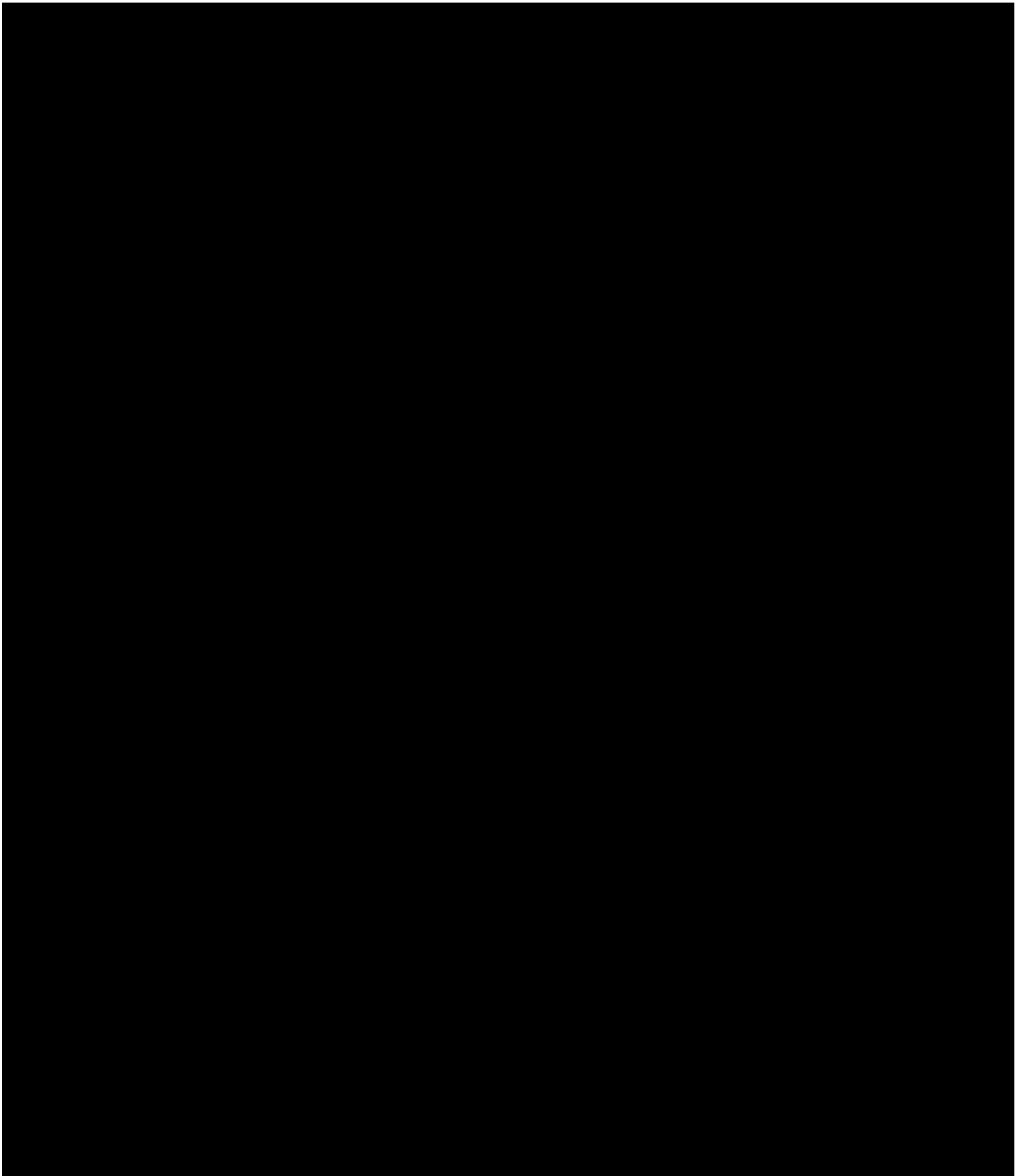




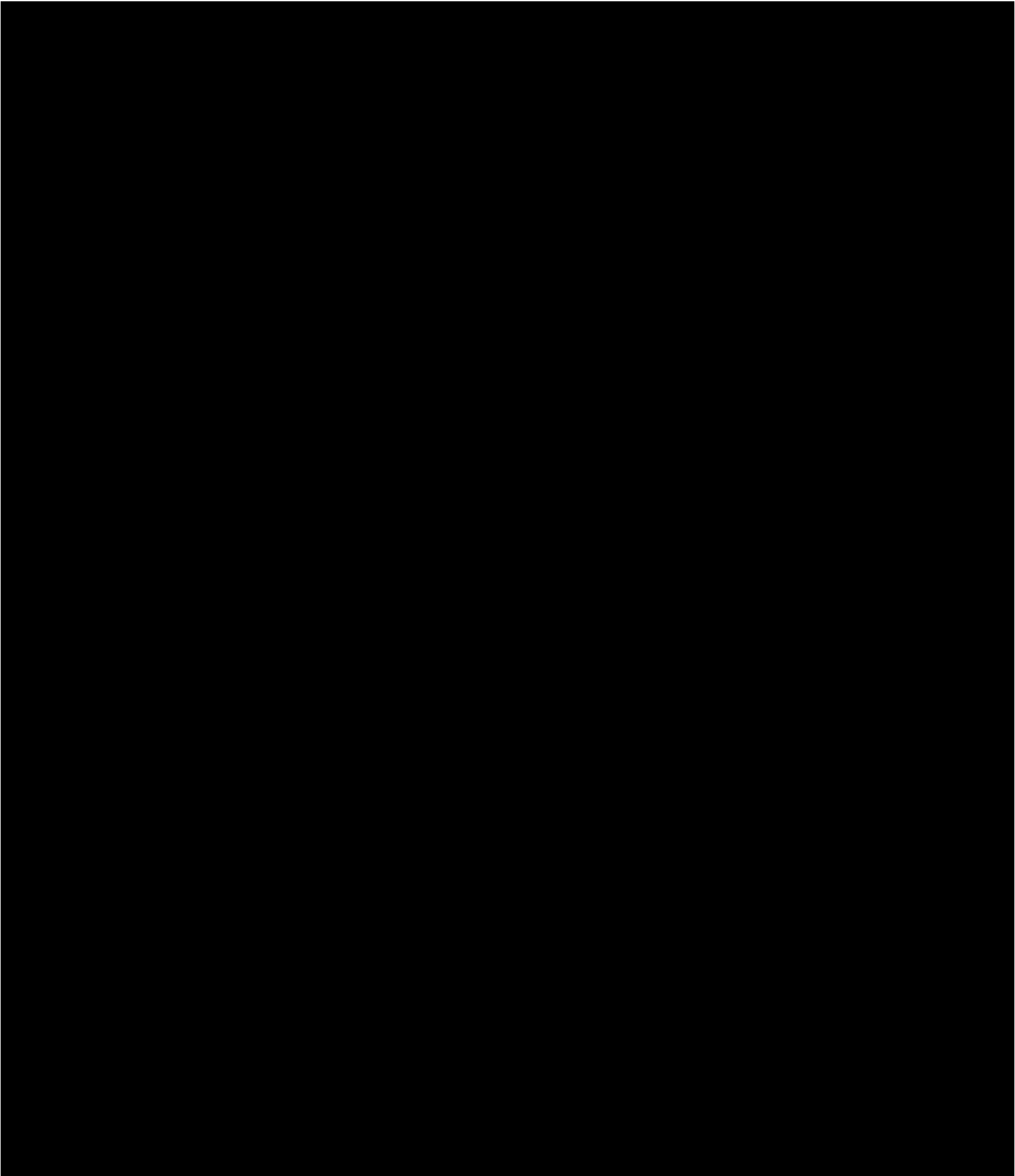


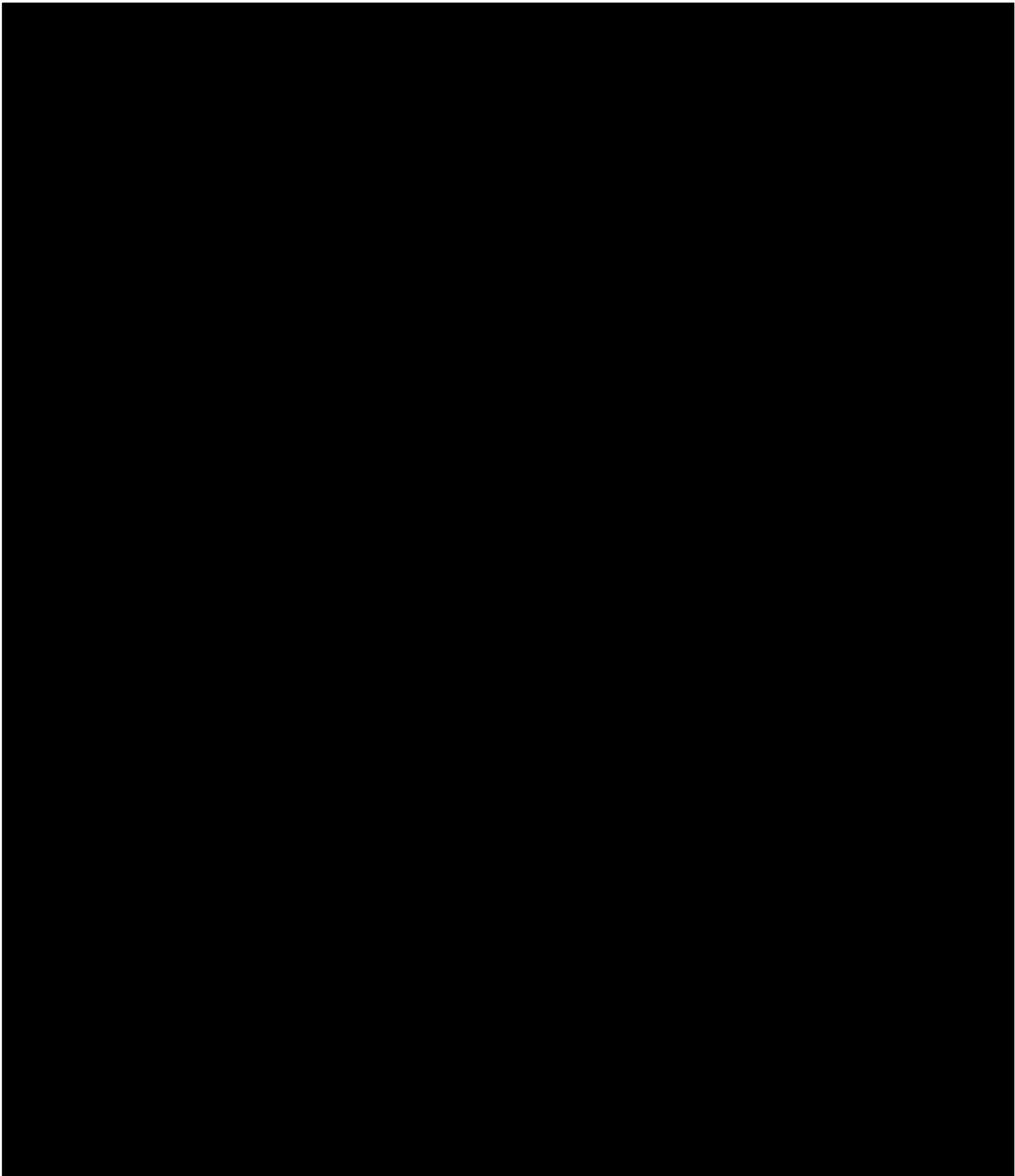


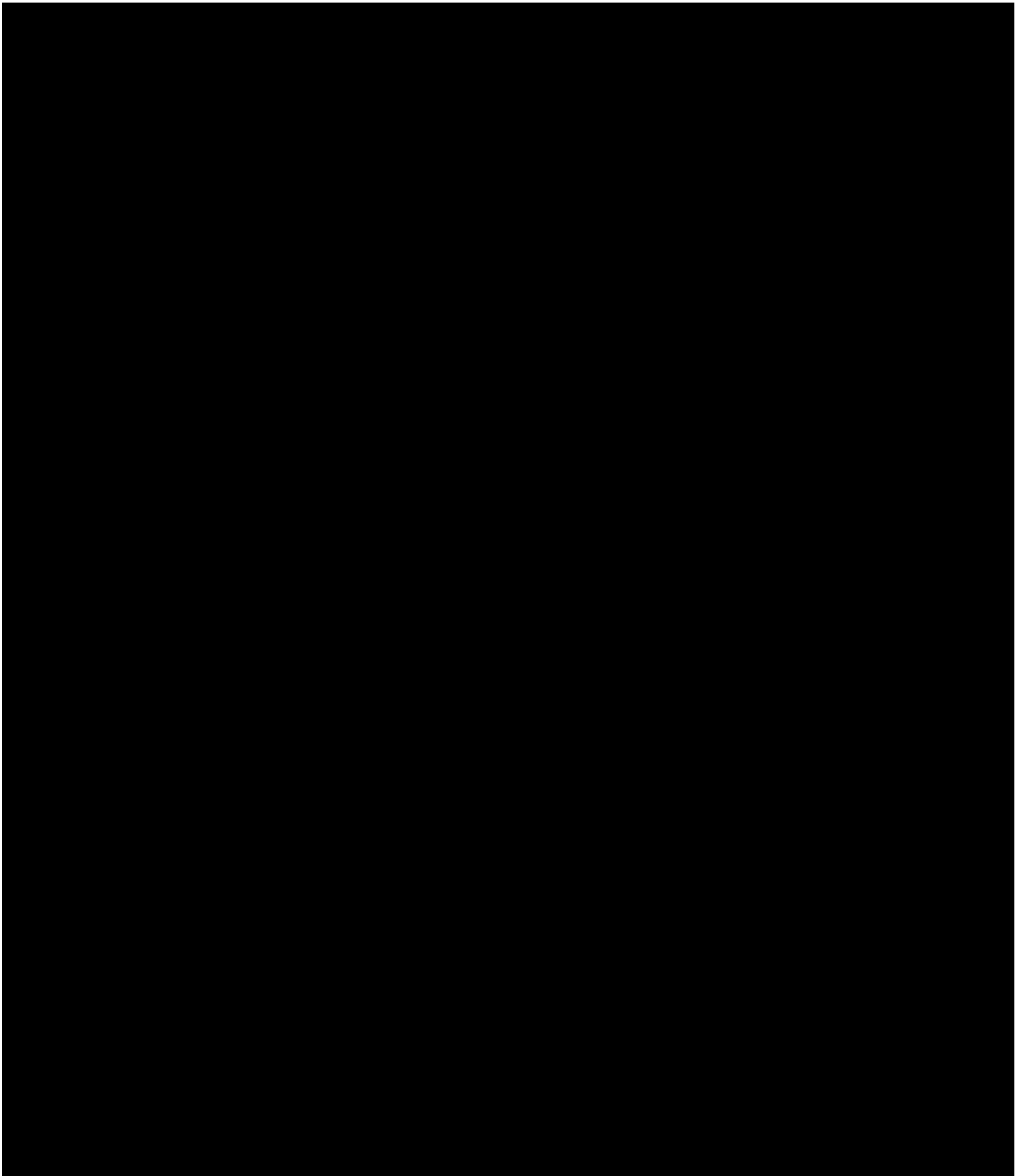


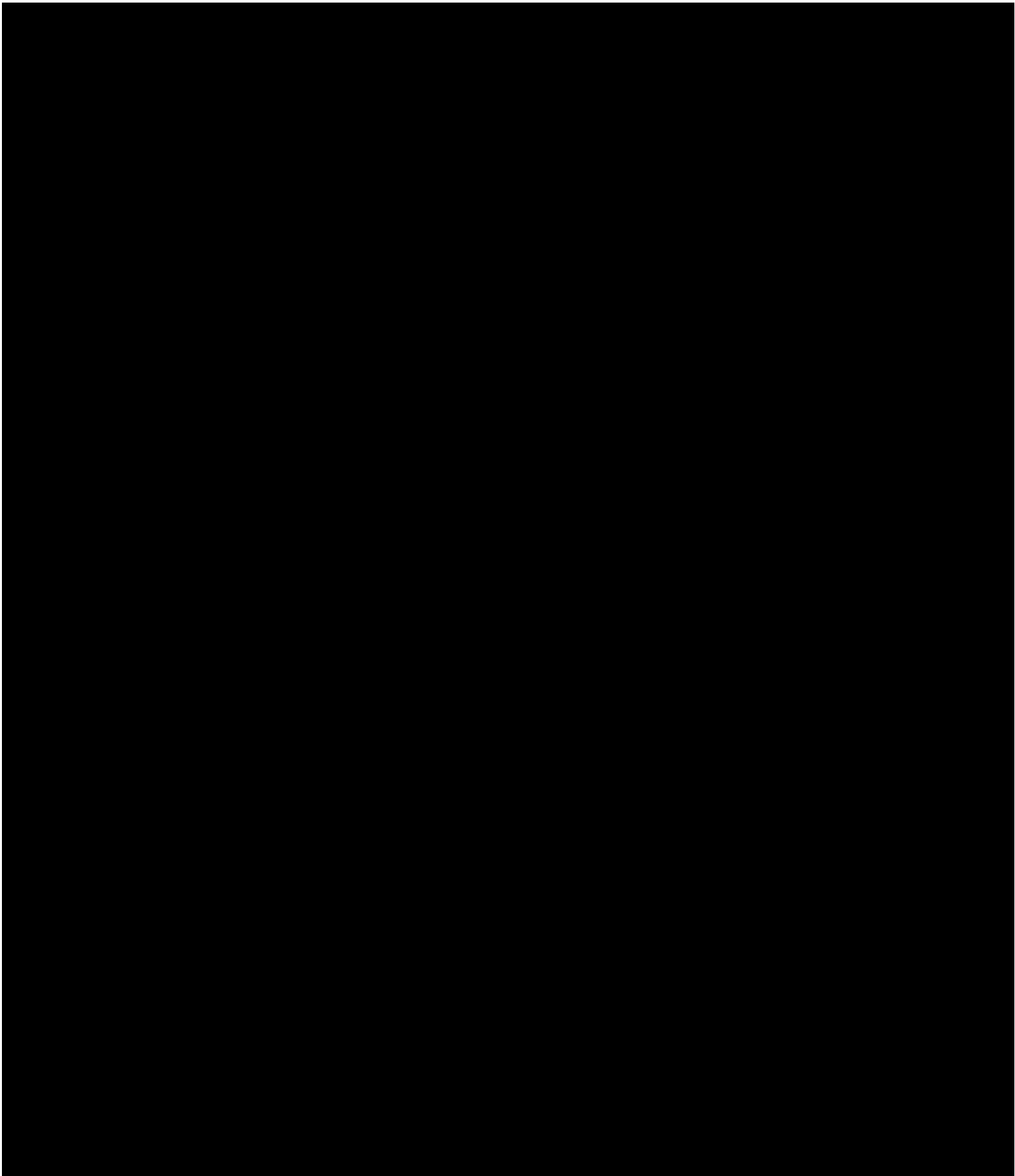


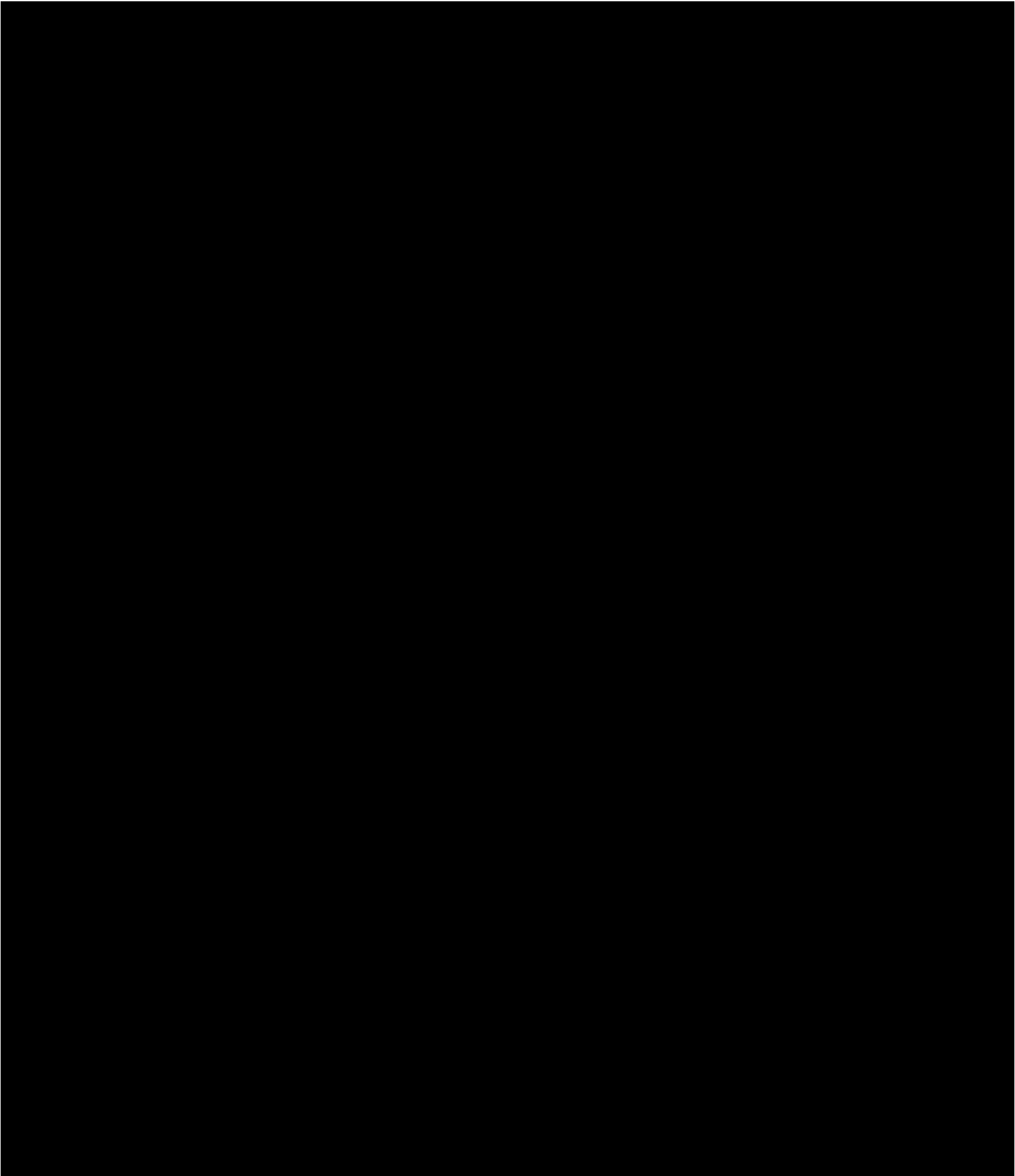


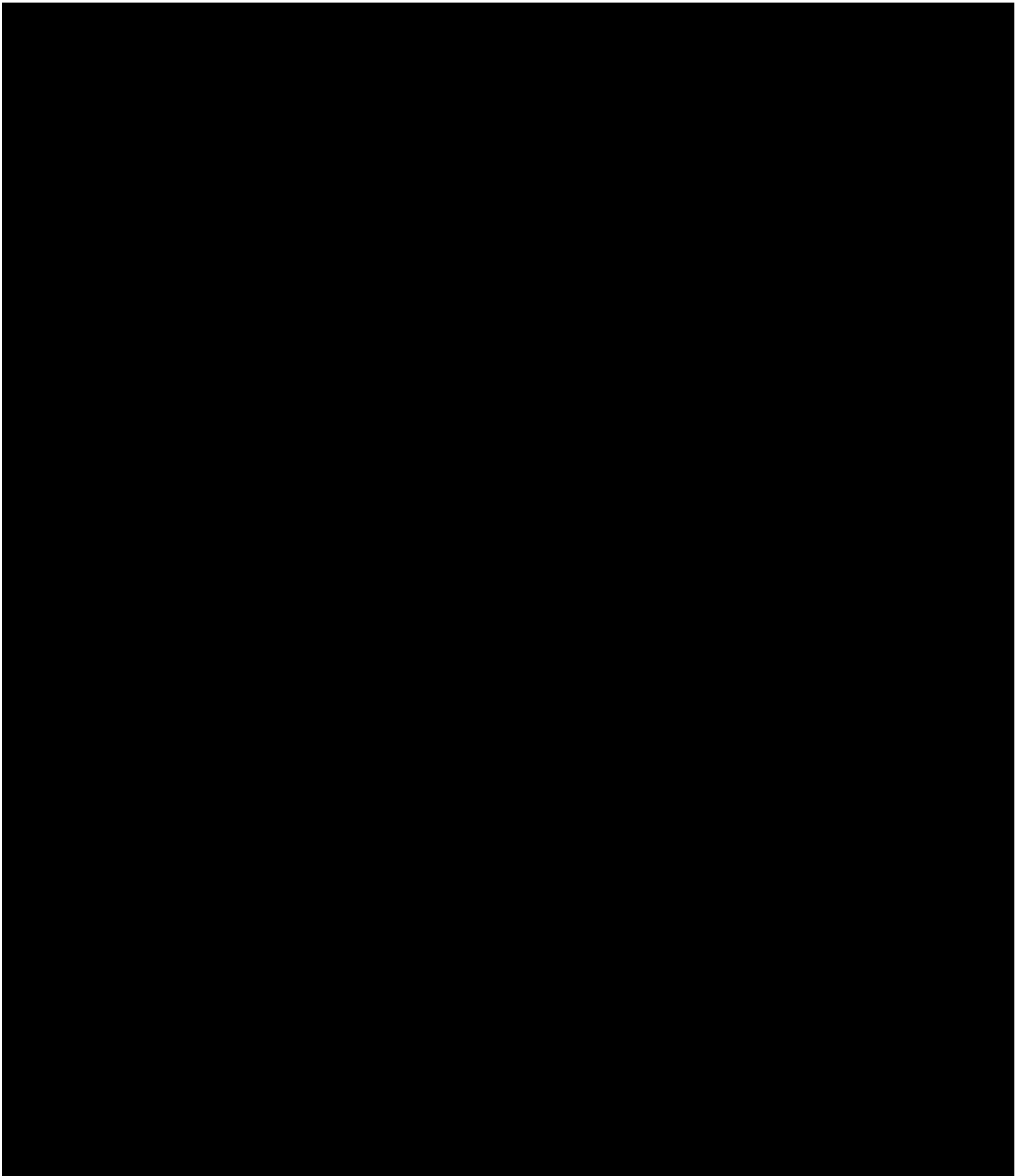


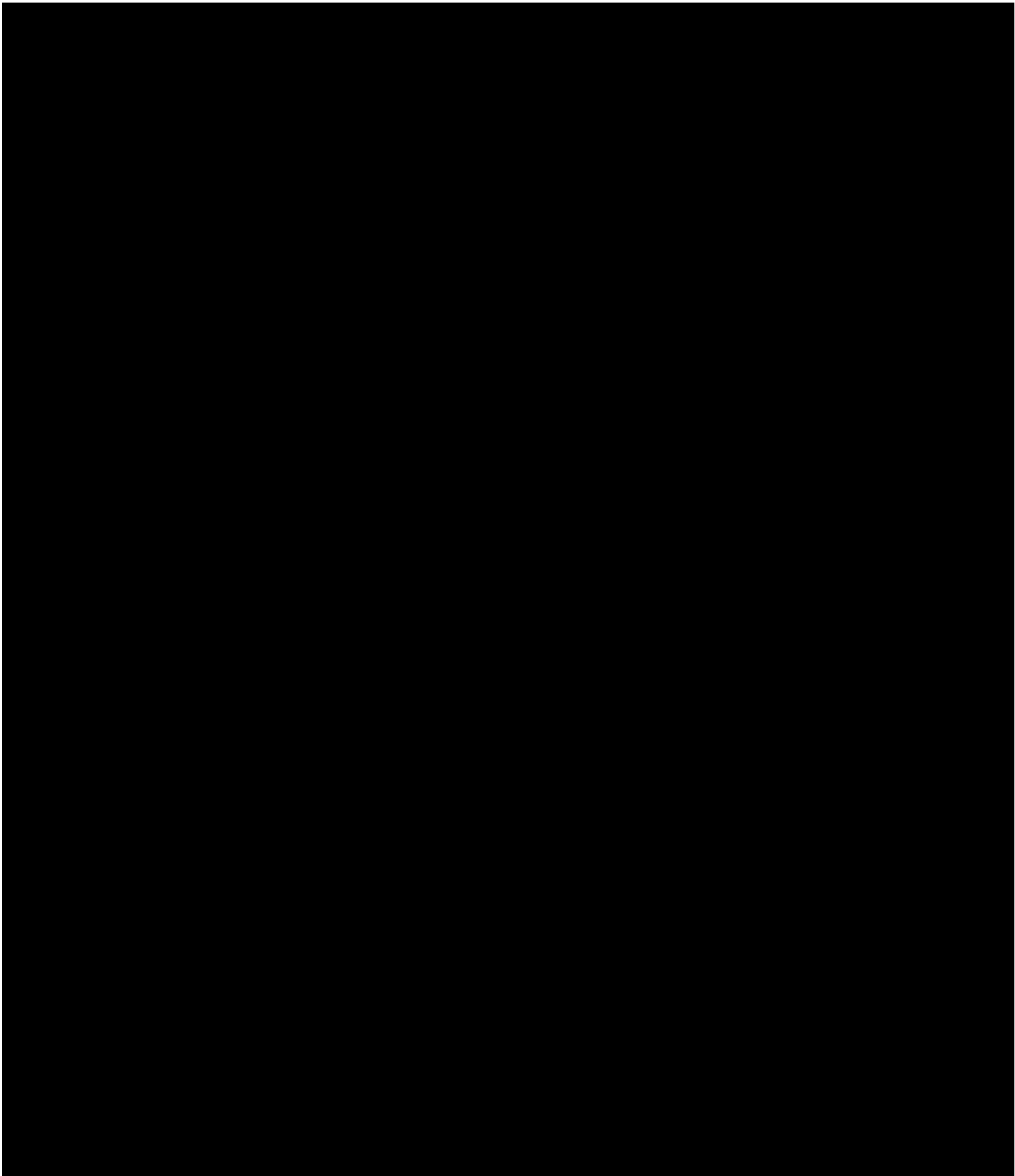


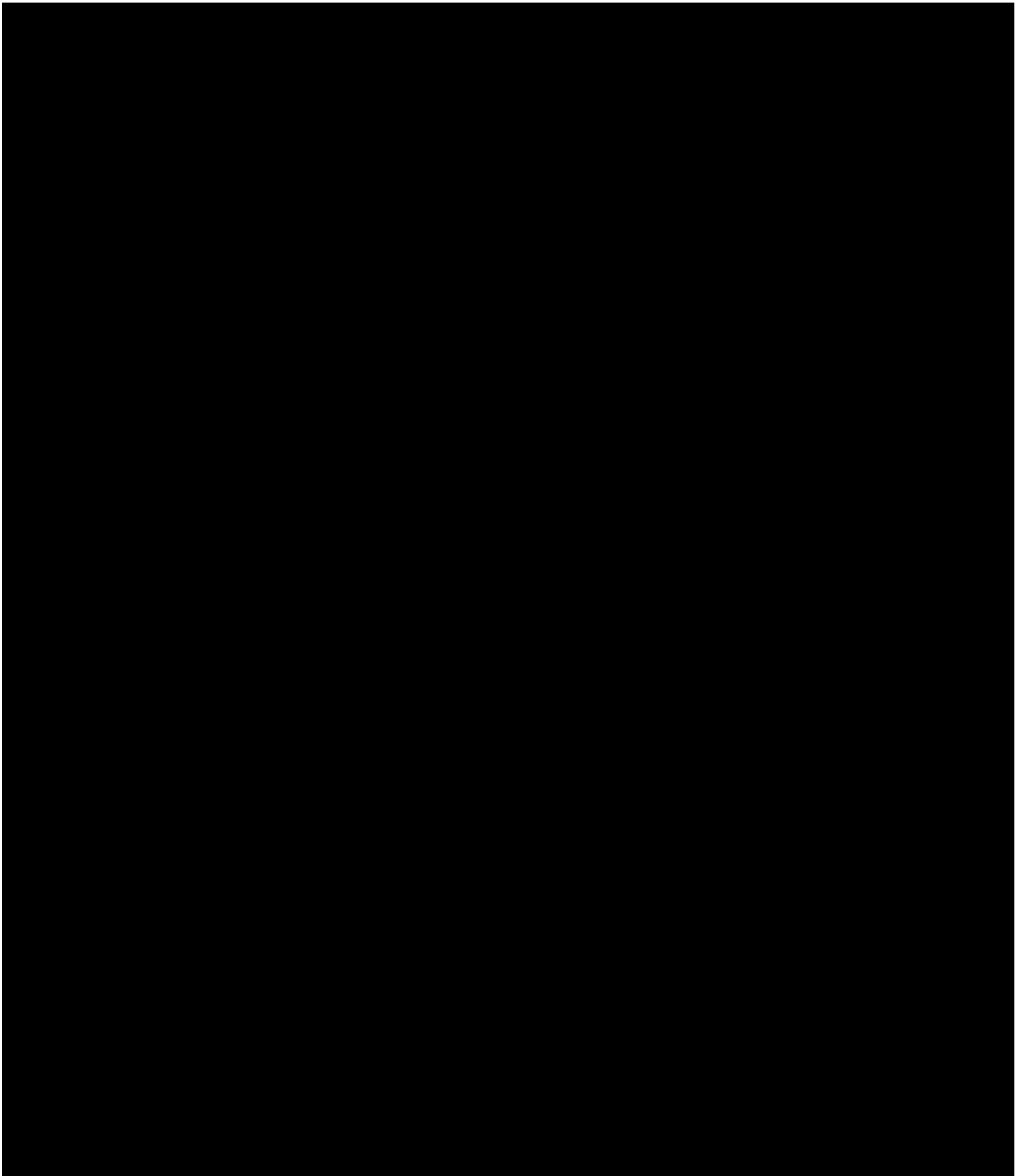




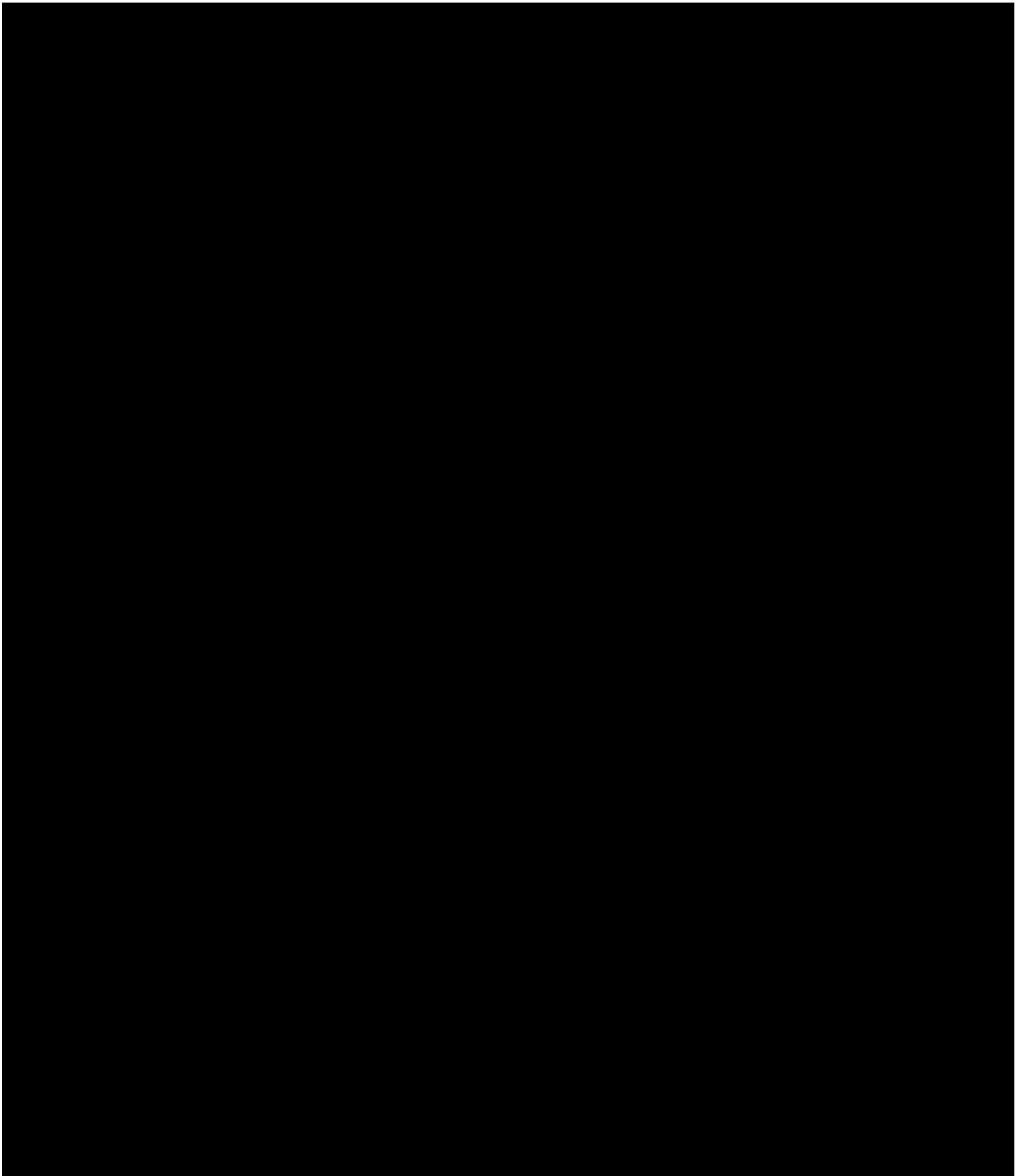


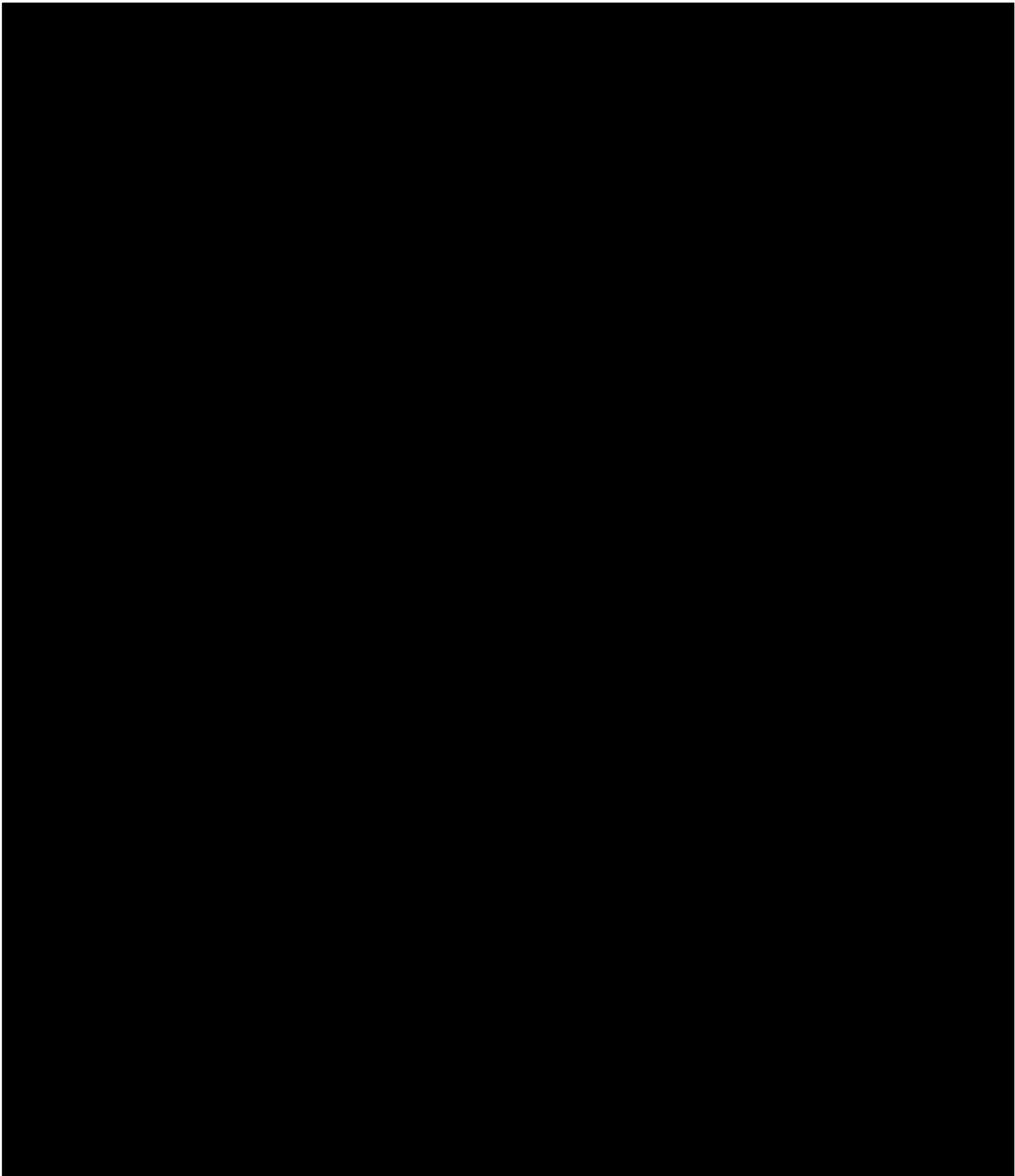


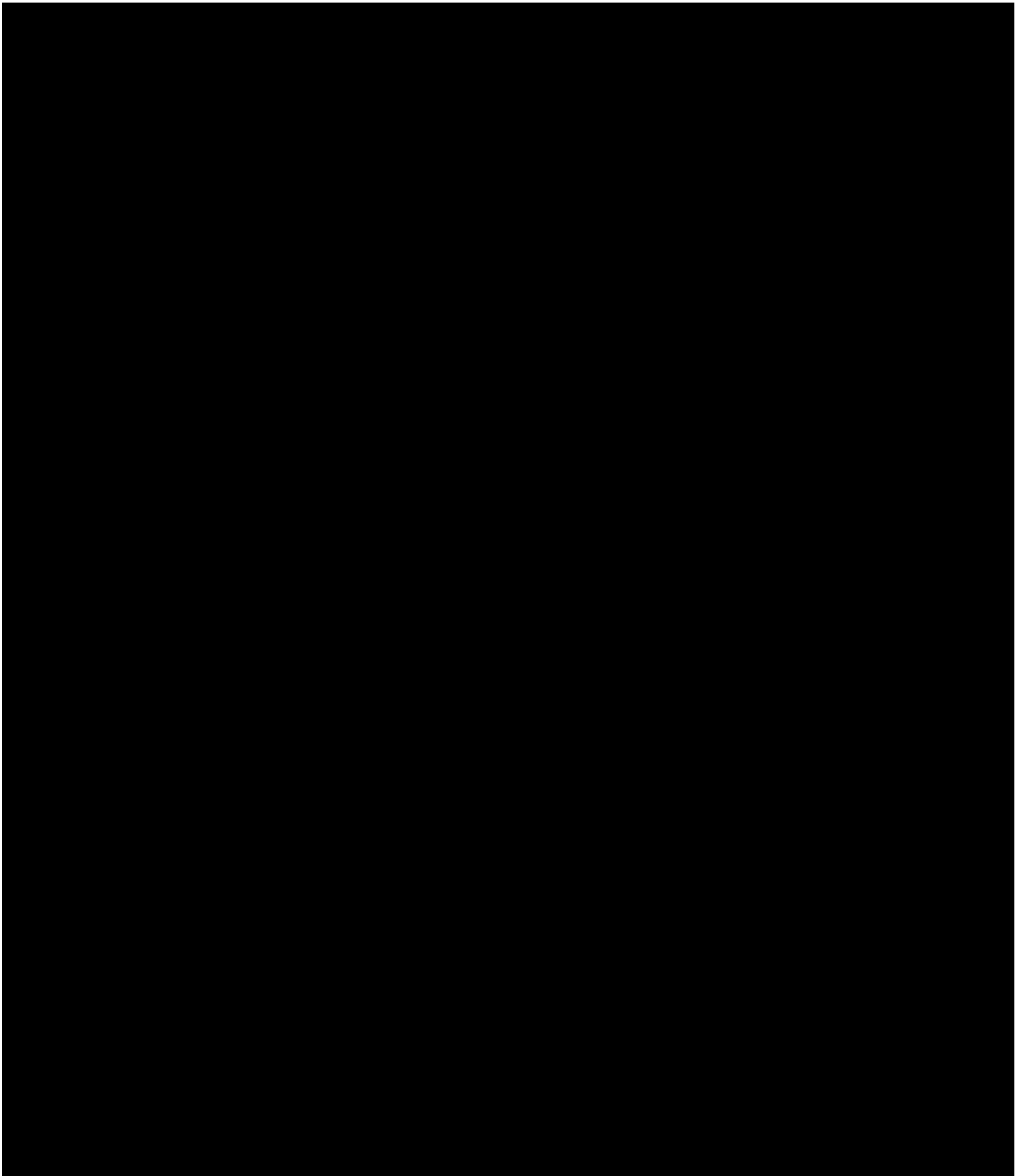


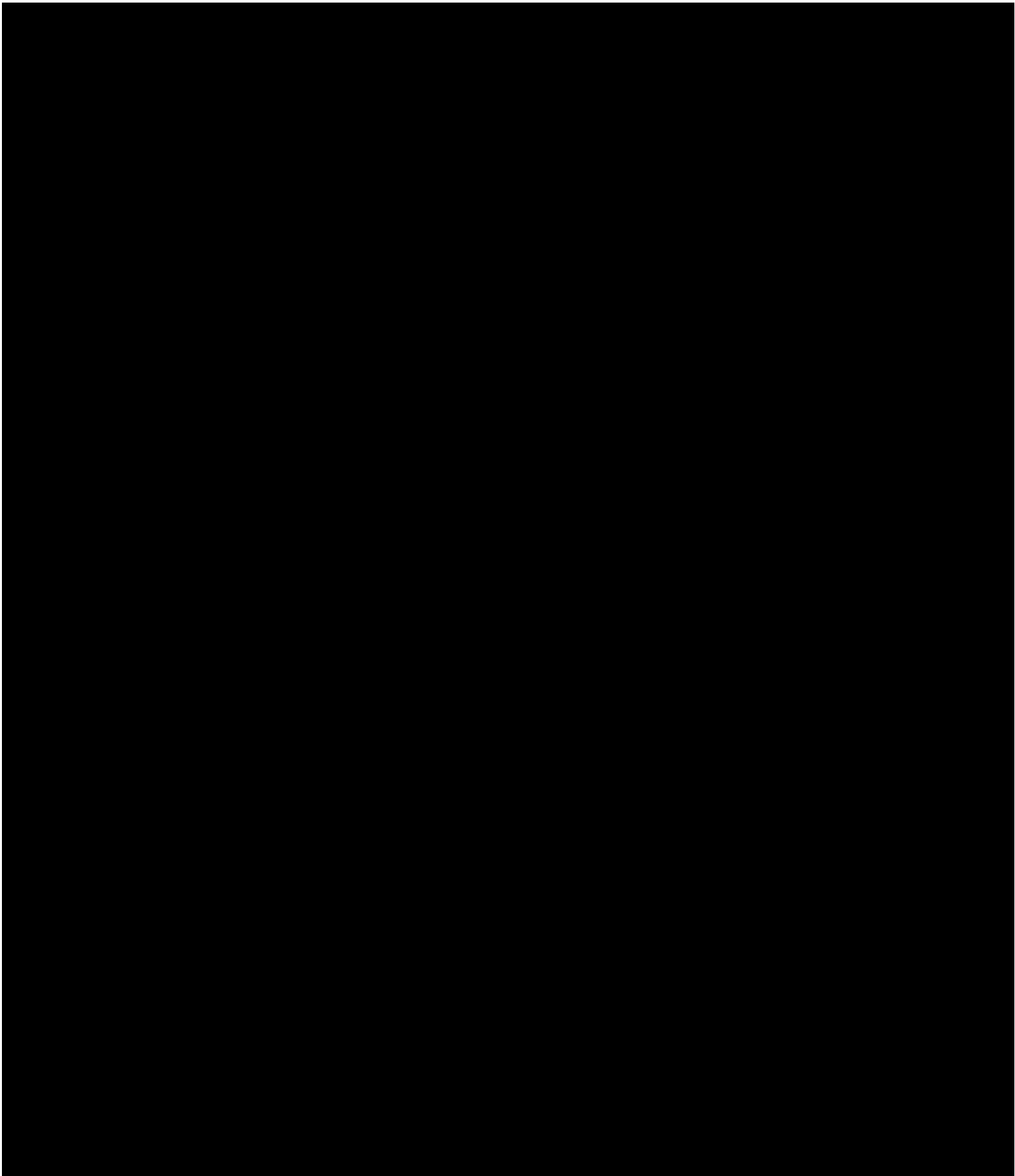


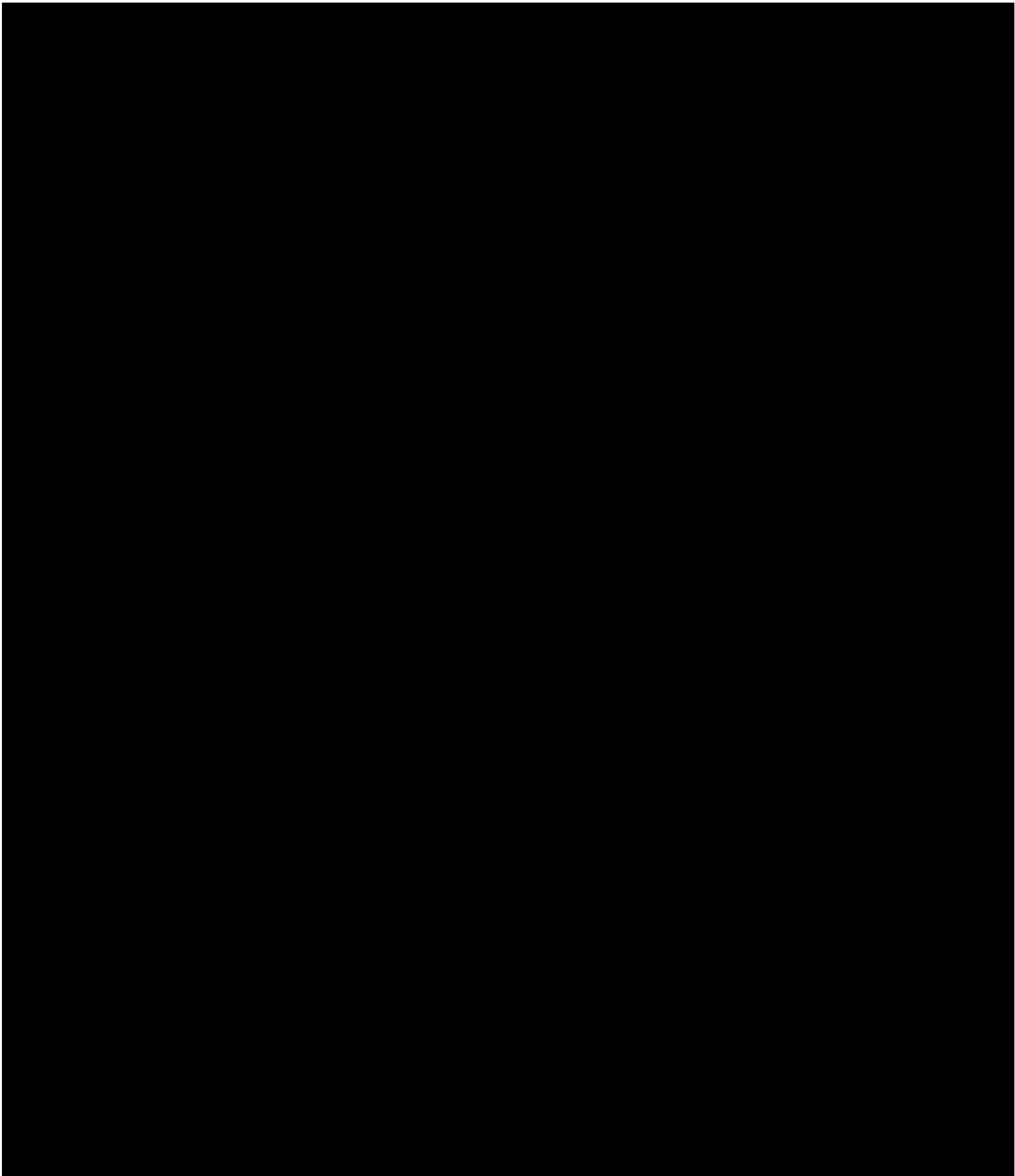


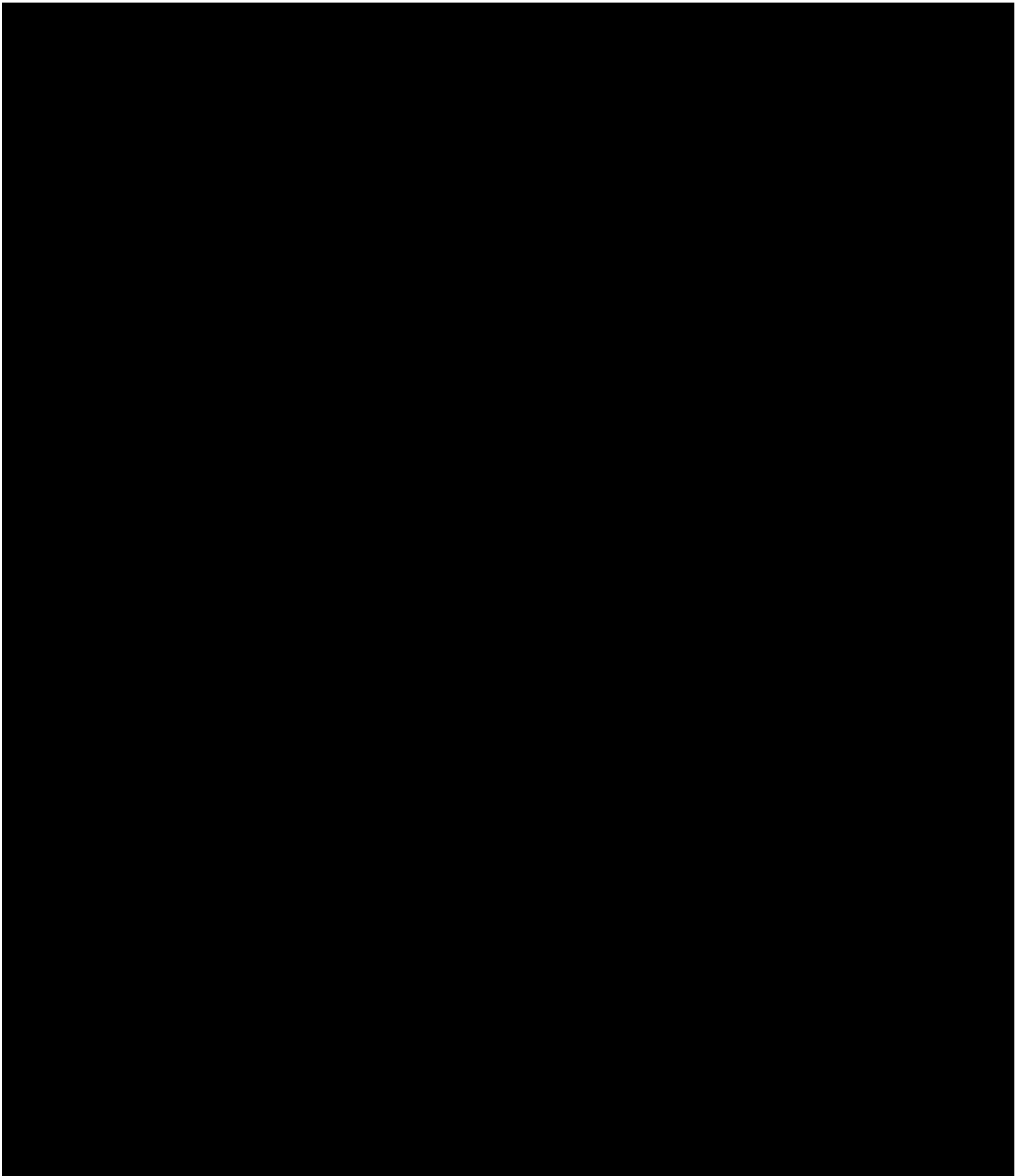












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# **EXHIBIT 34**



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE  
CENTRE GMBH and WEST PUBLISHING  
CORPORATION,

Plaintiffs/Counterdefendants

v.

ROSS INTELLIGENCE INC.,

Defendant/Counterclaimant.

1:20-cv-00613-SB

**CONFIDENTIAL, HIGHLY  
CONFIDENTIAL – ATTORNEYS’ EYES  
ONLY**

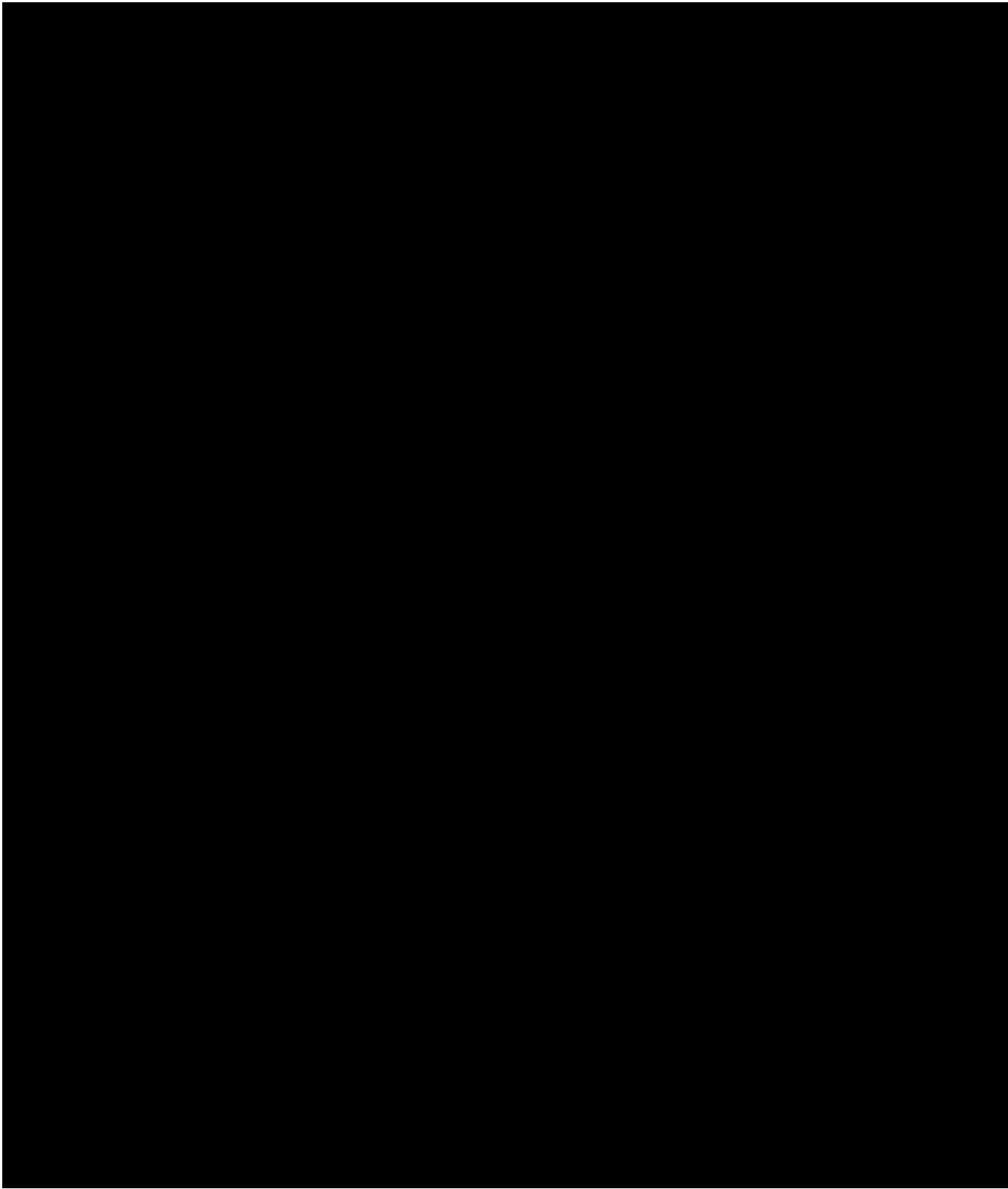
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JAMES D. RATLIFF, Ph.D.**

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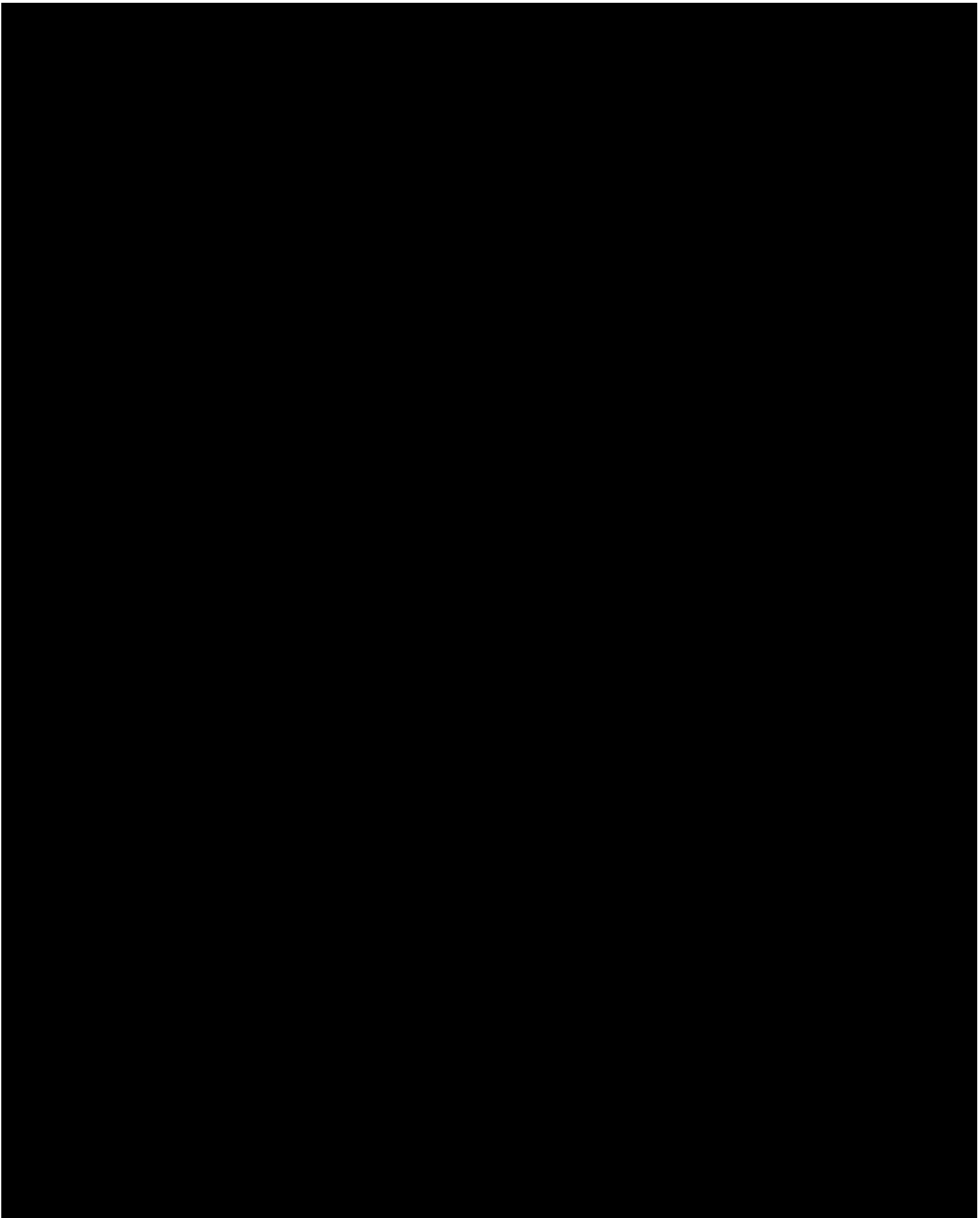
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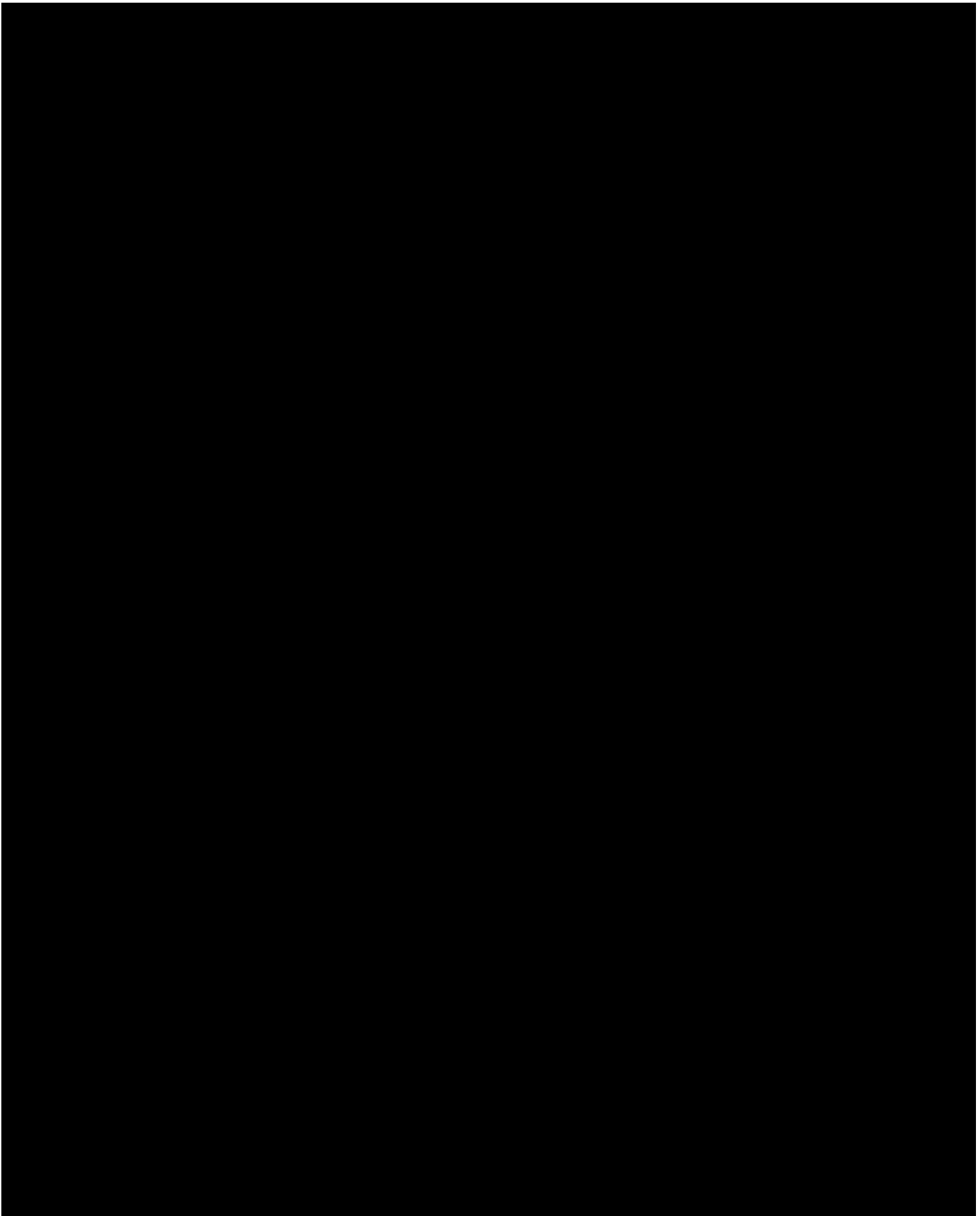
II. Summary of opinions ..... 7



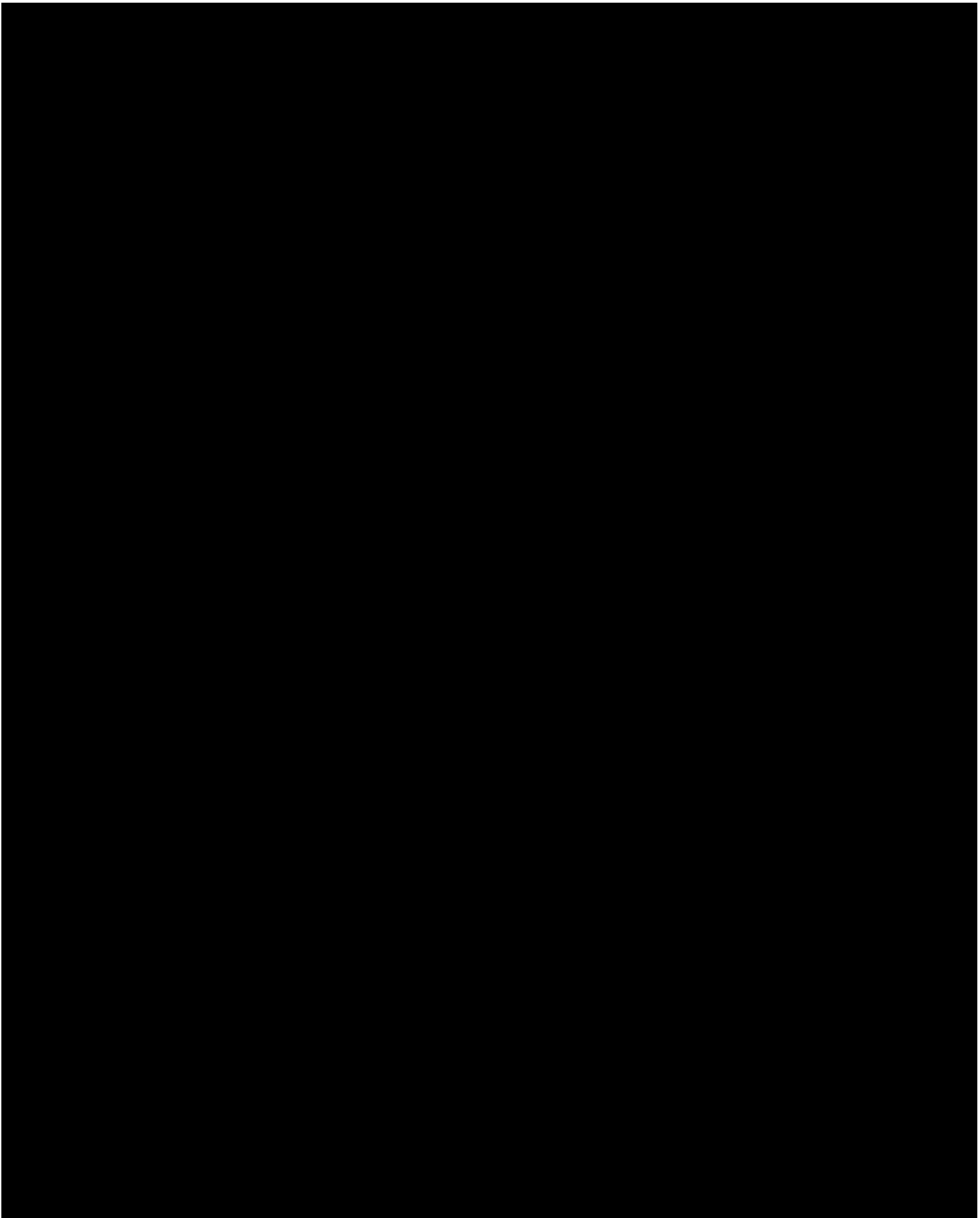
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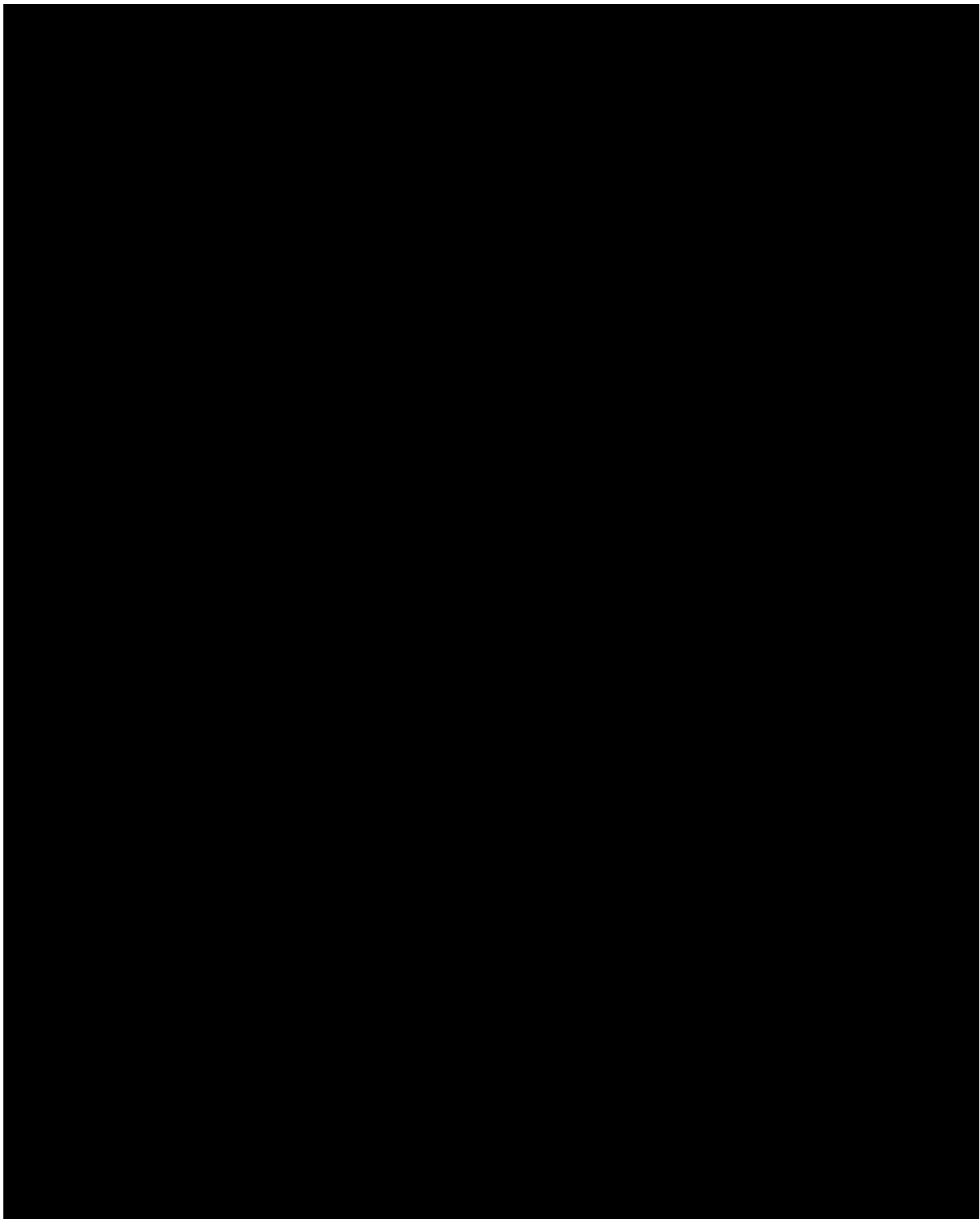
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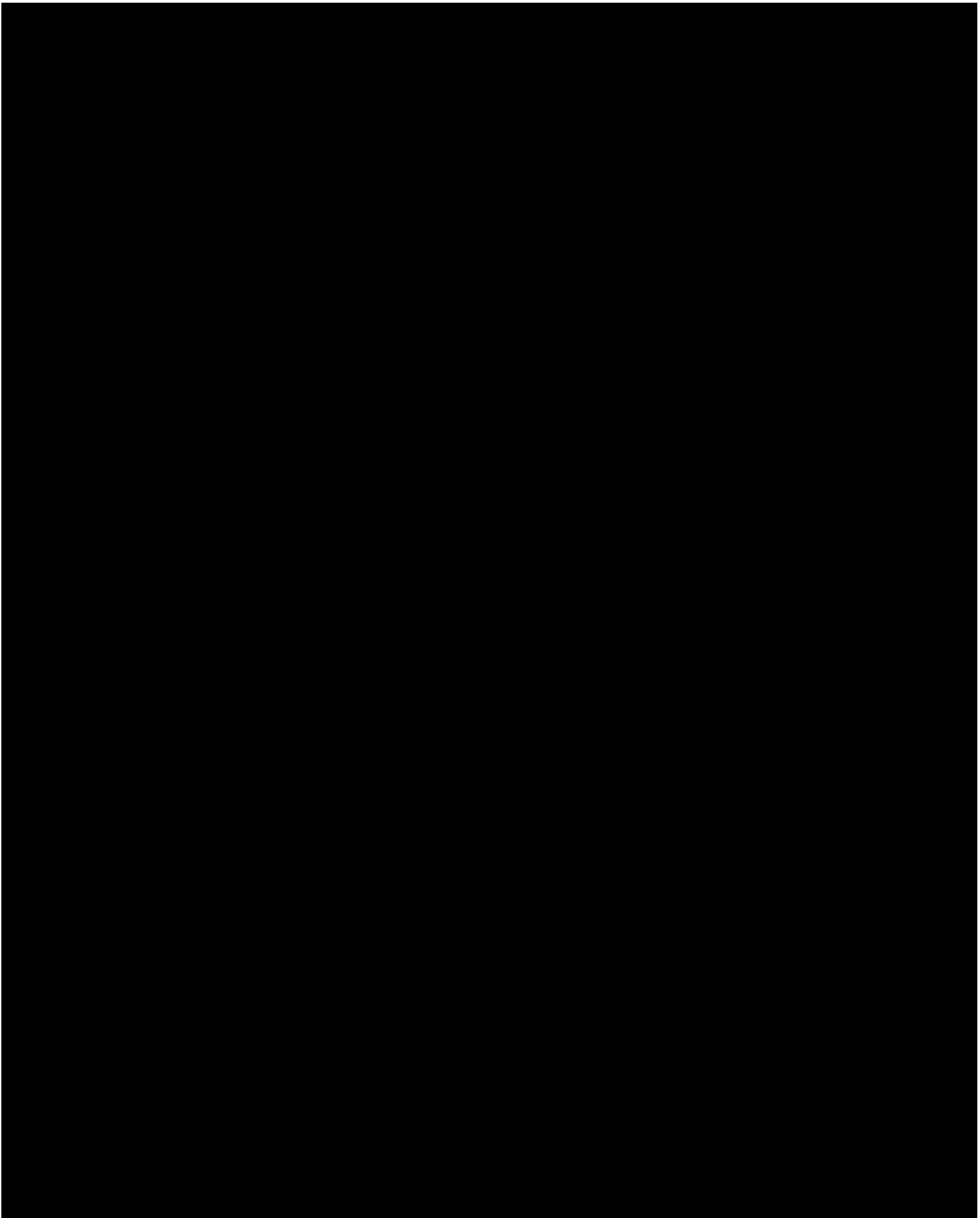
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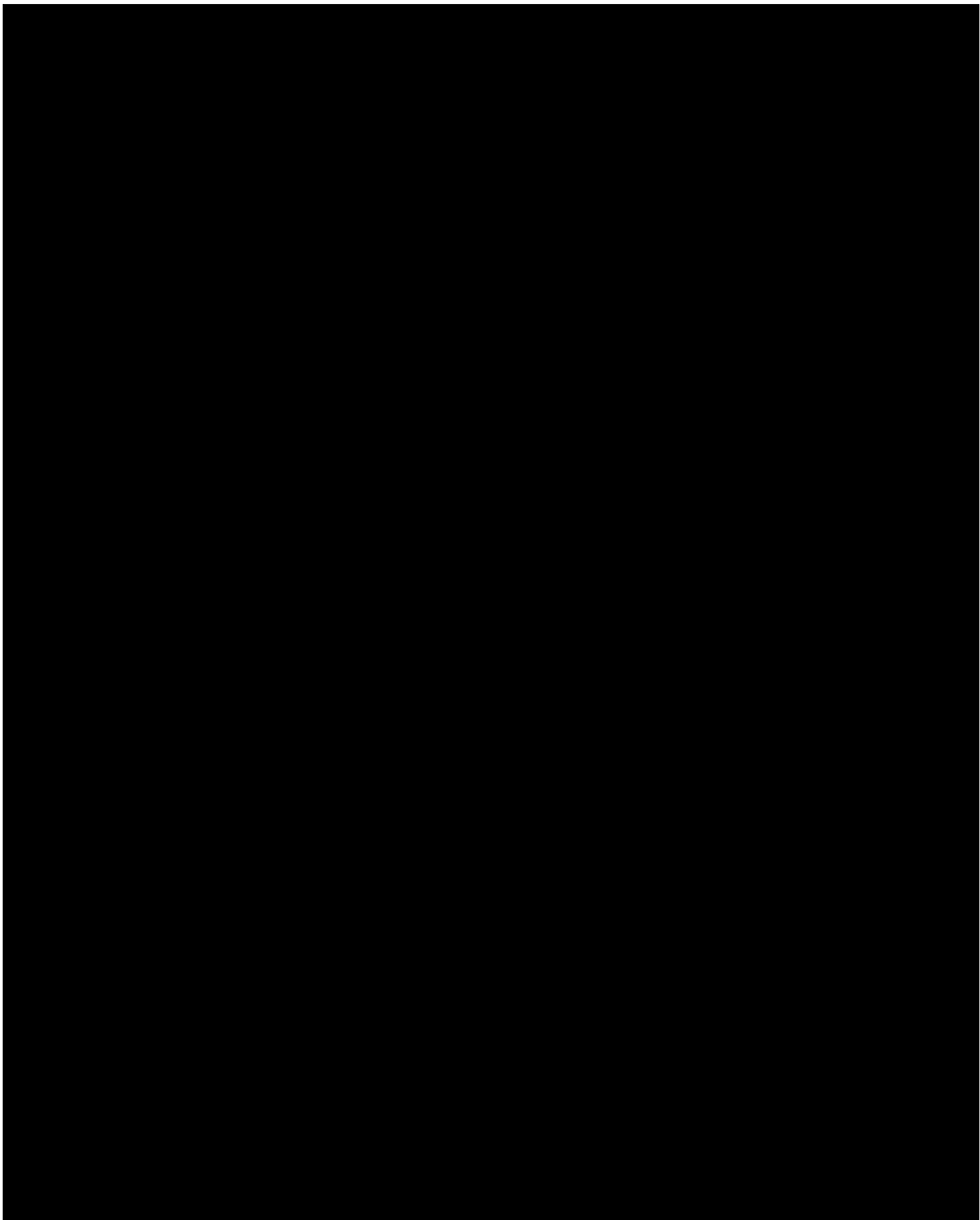
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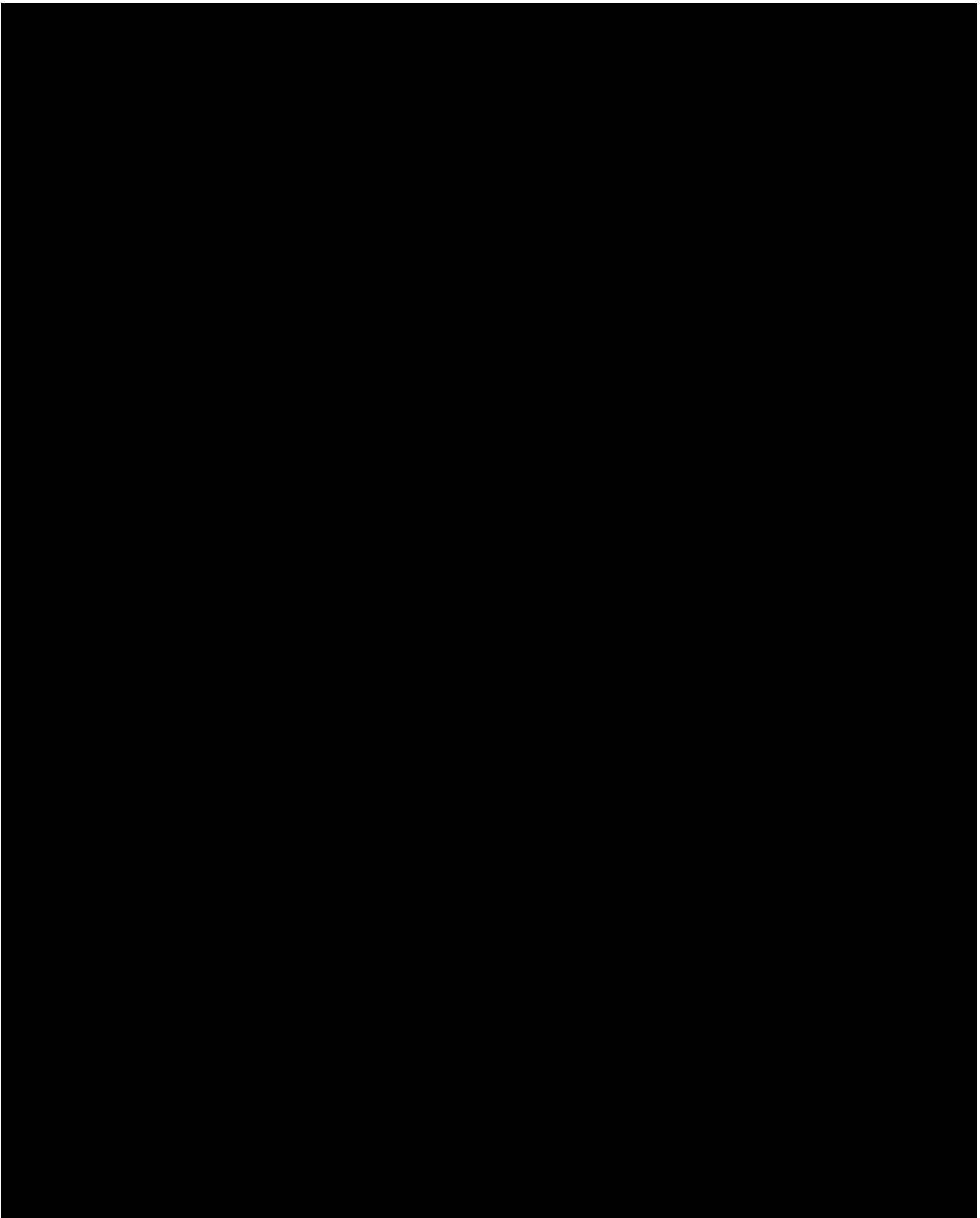


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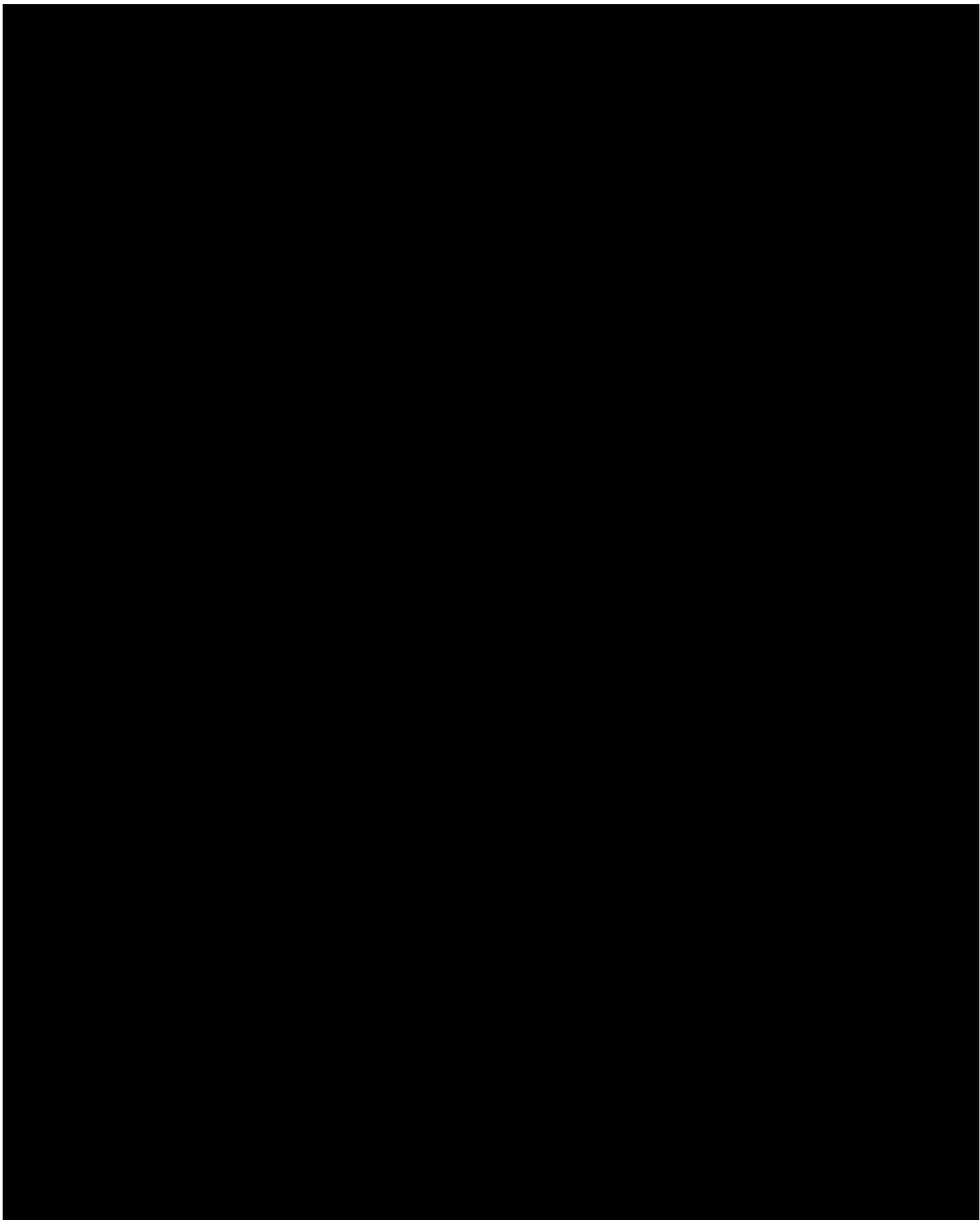




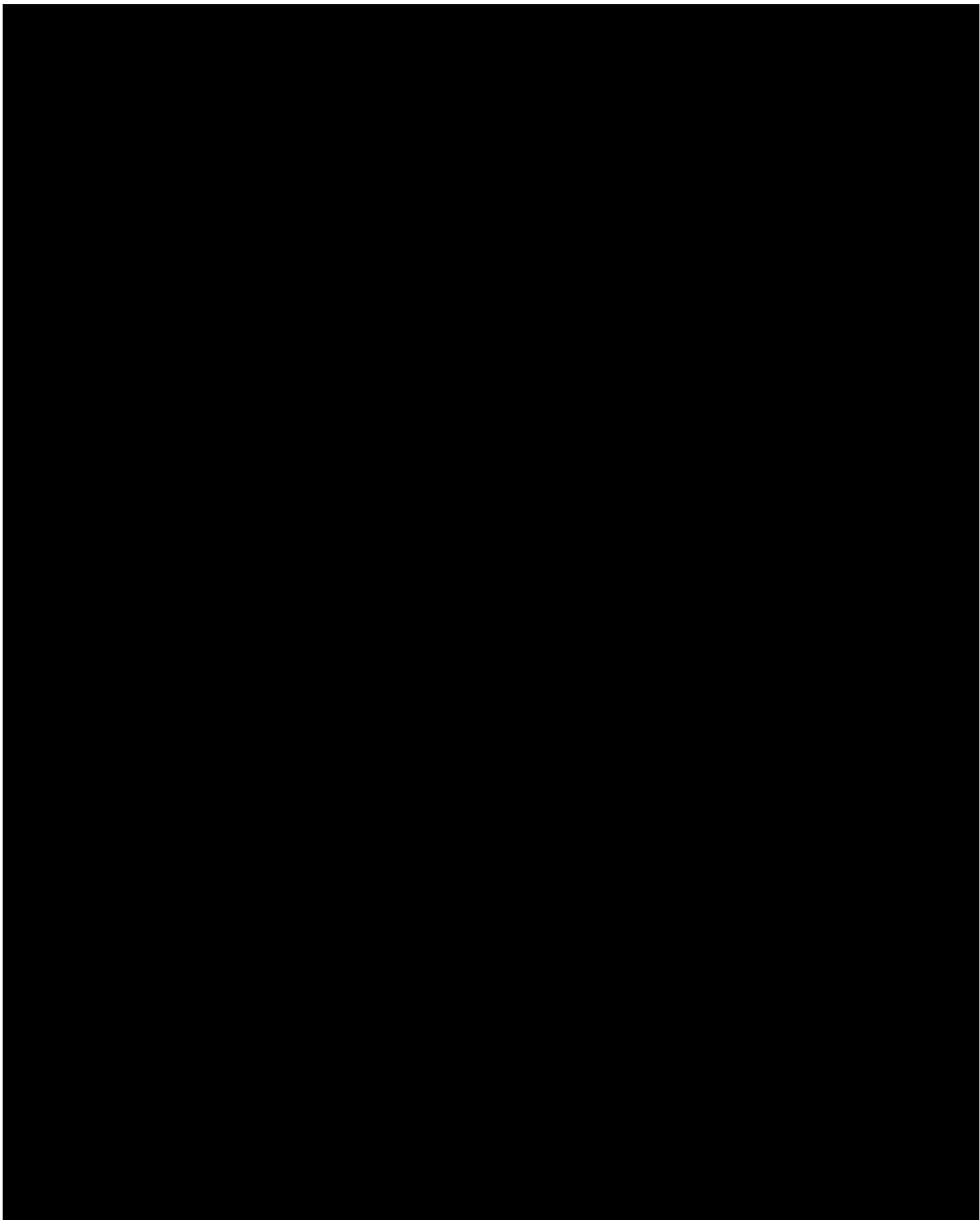
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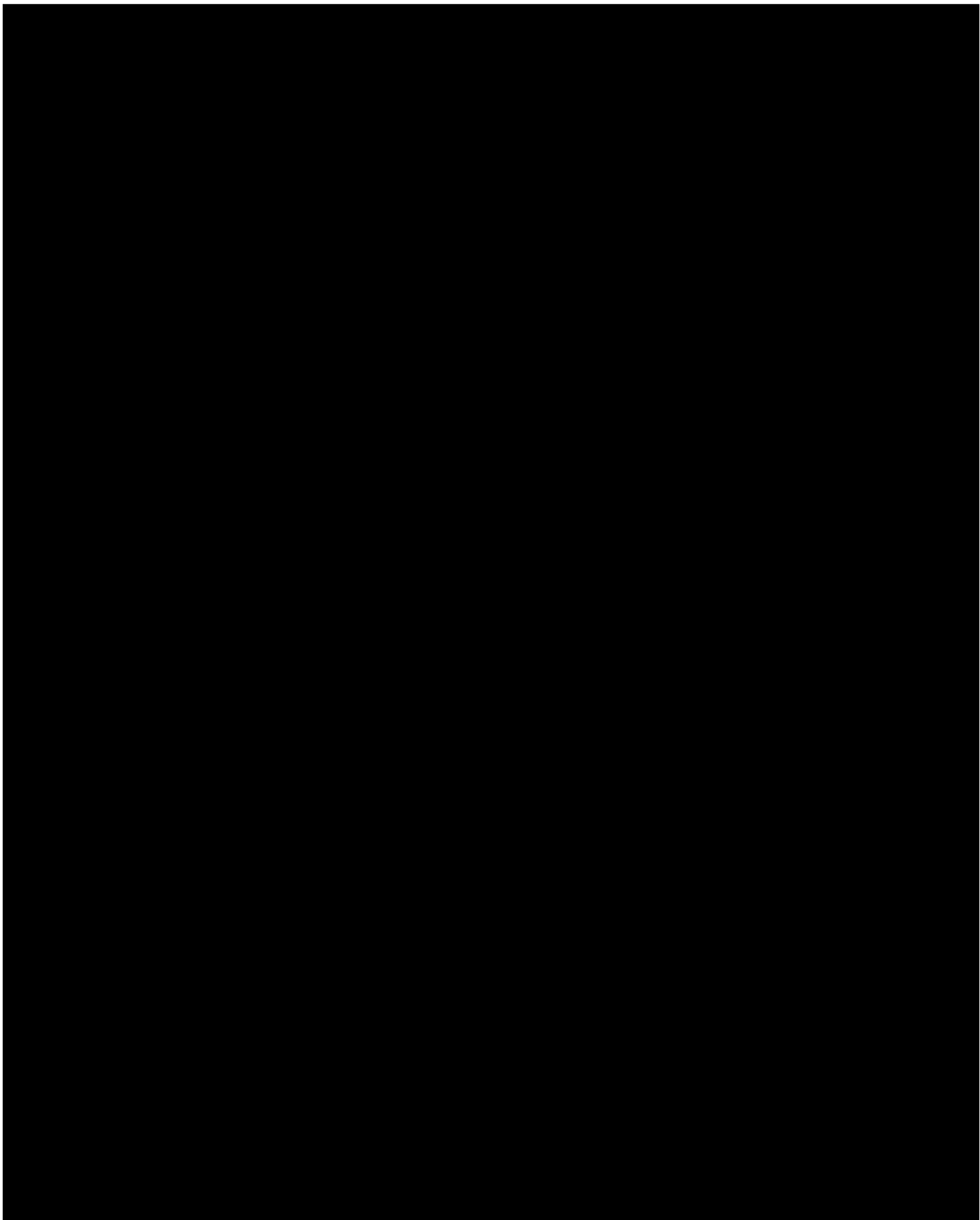
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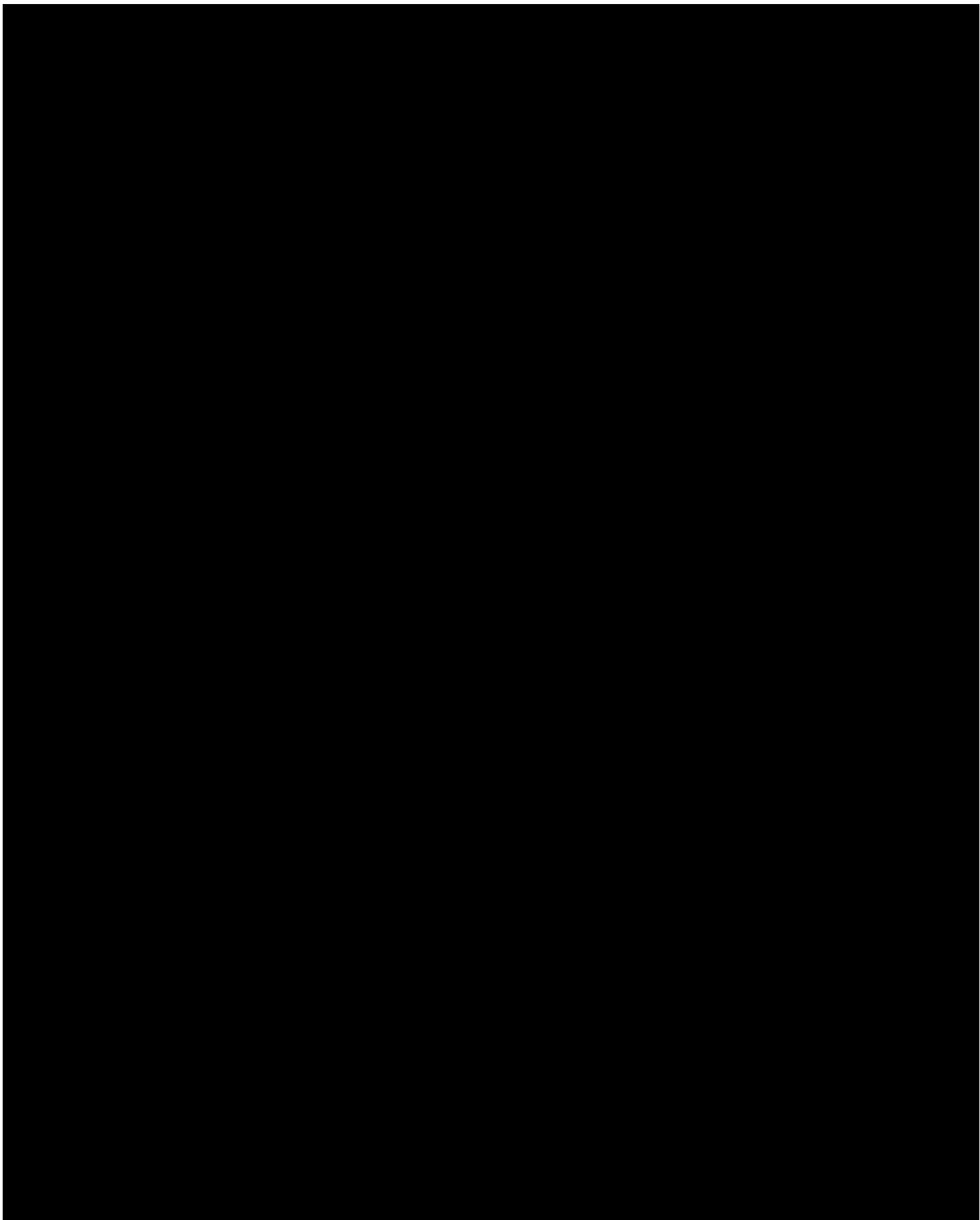
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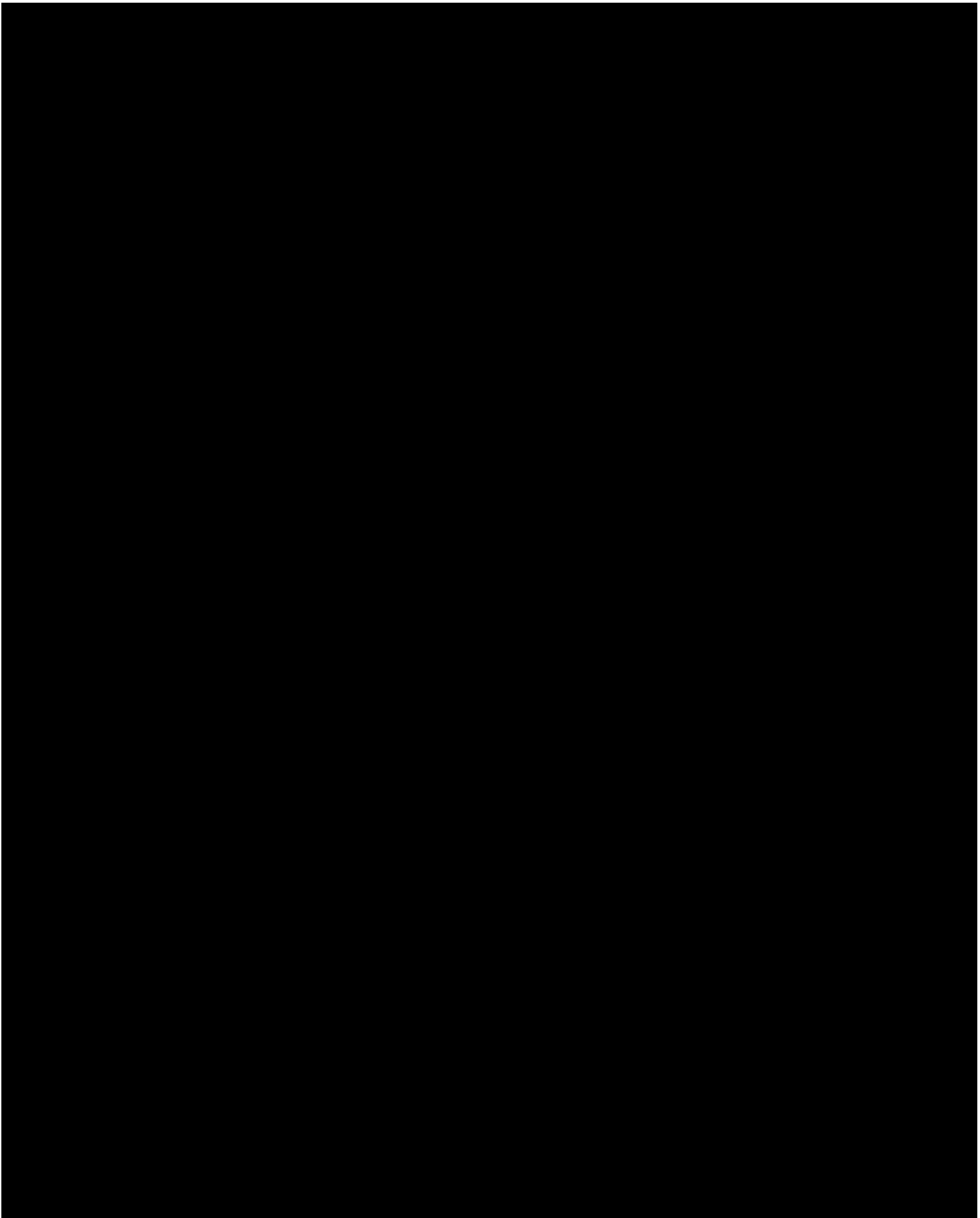
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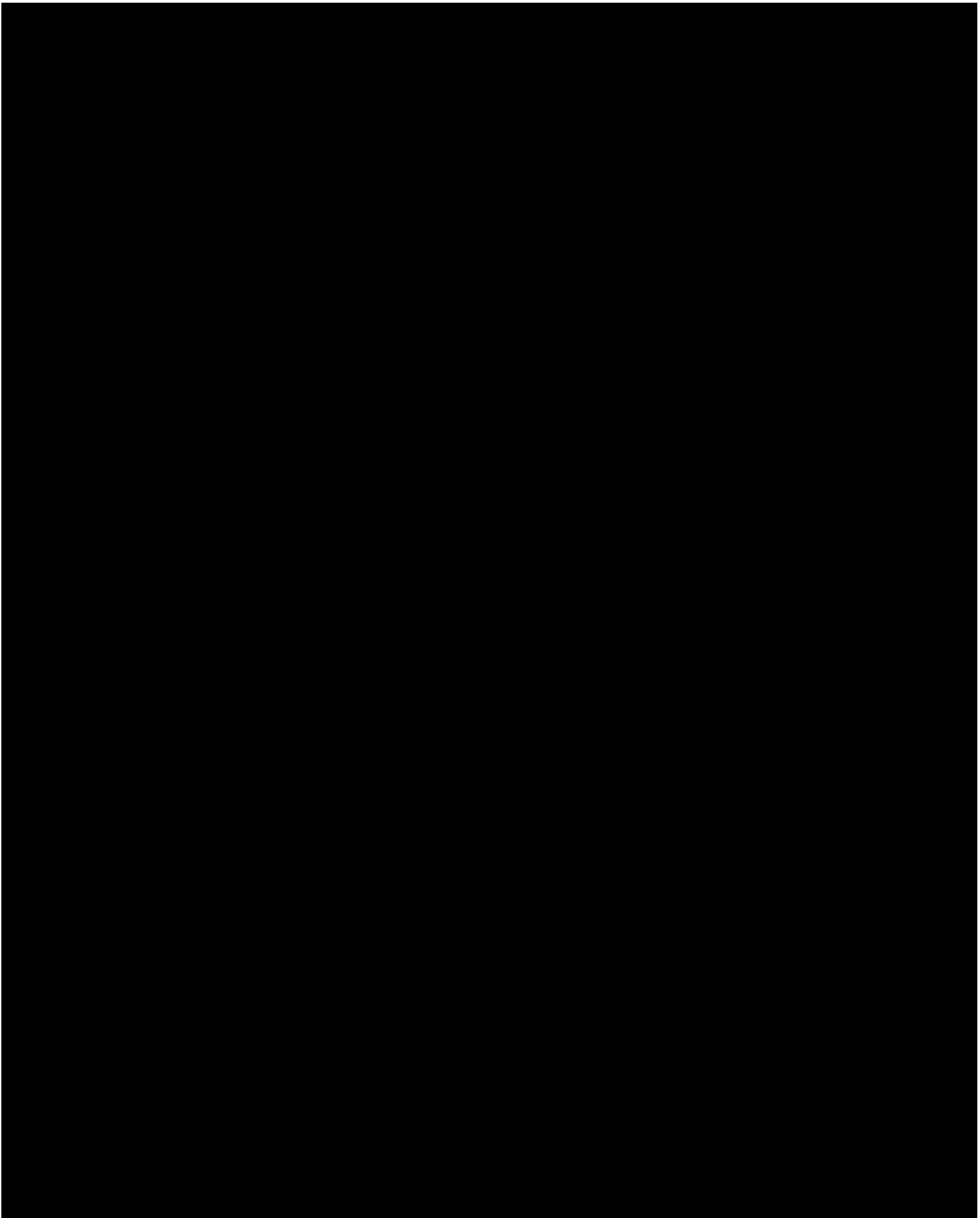
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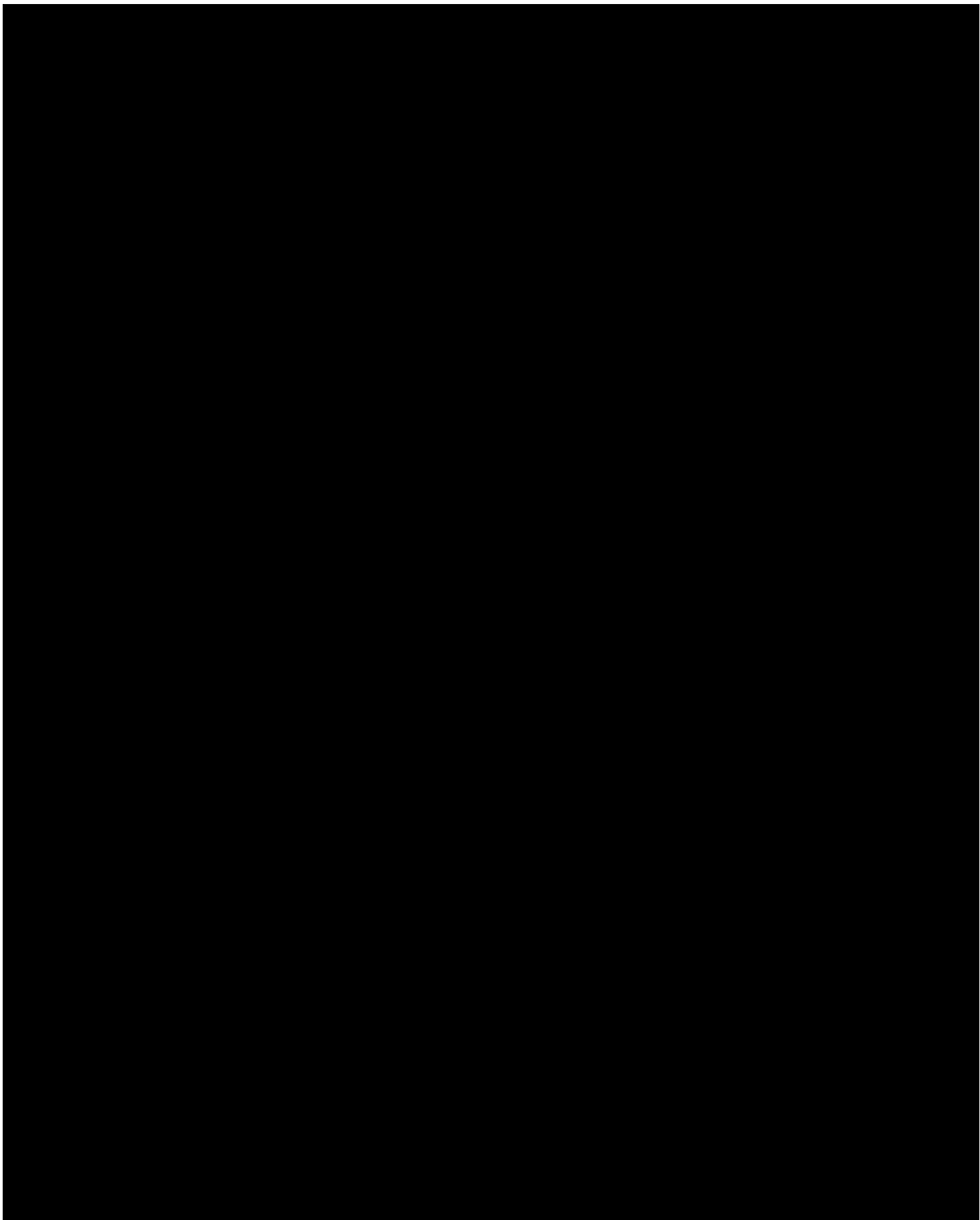
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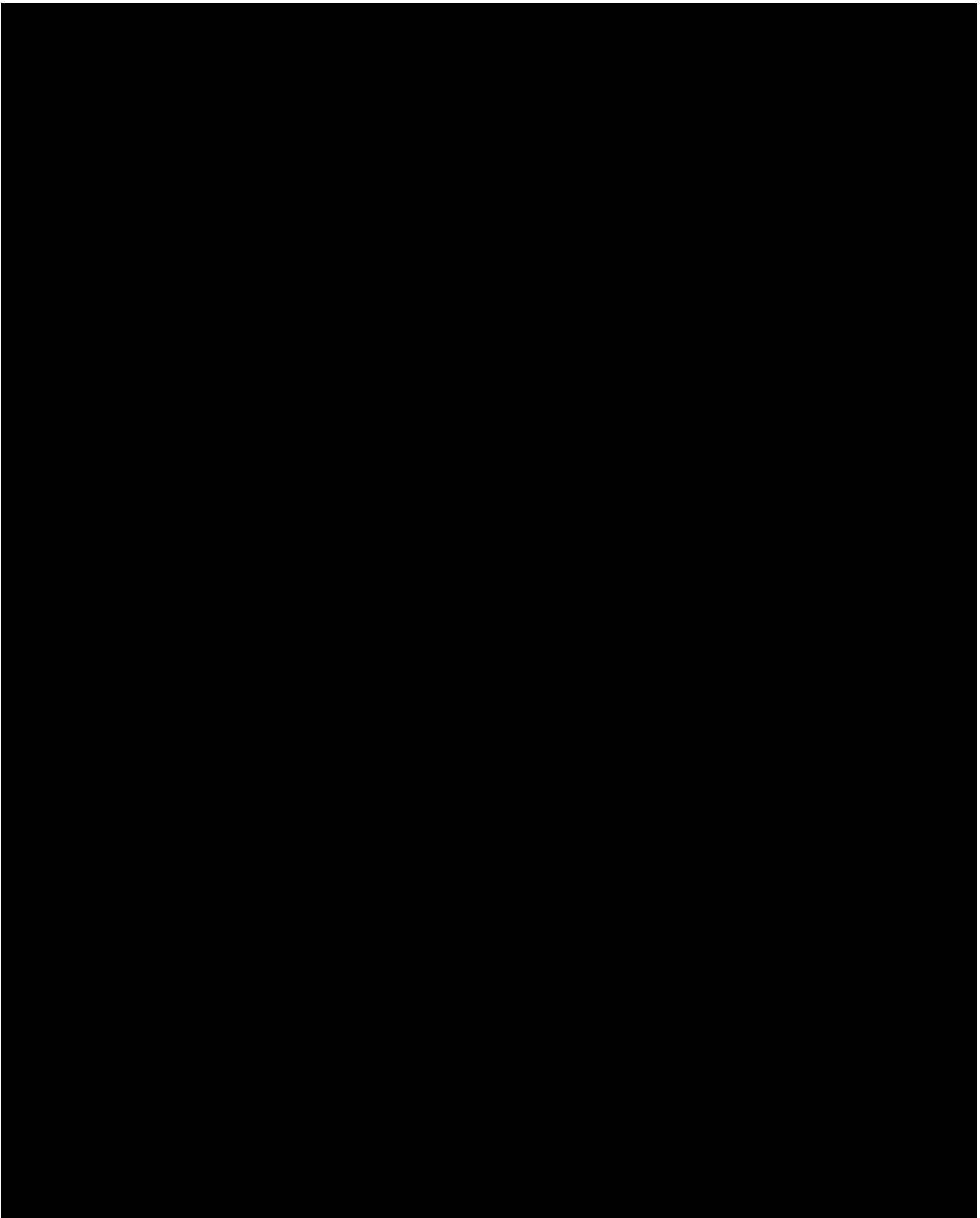


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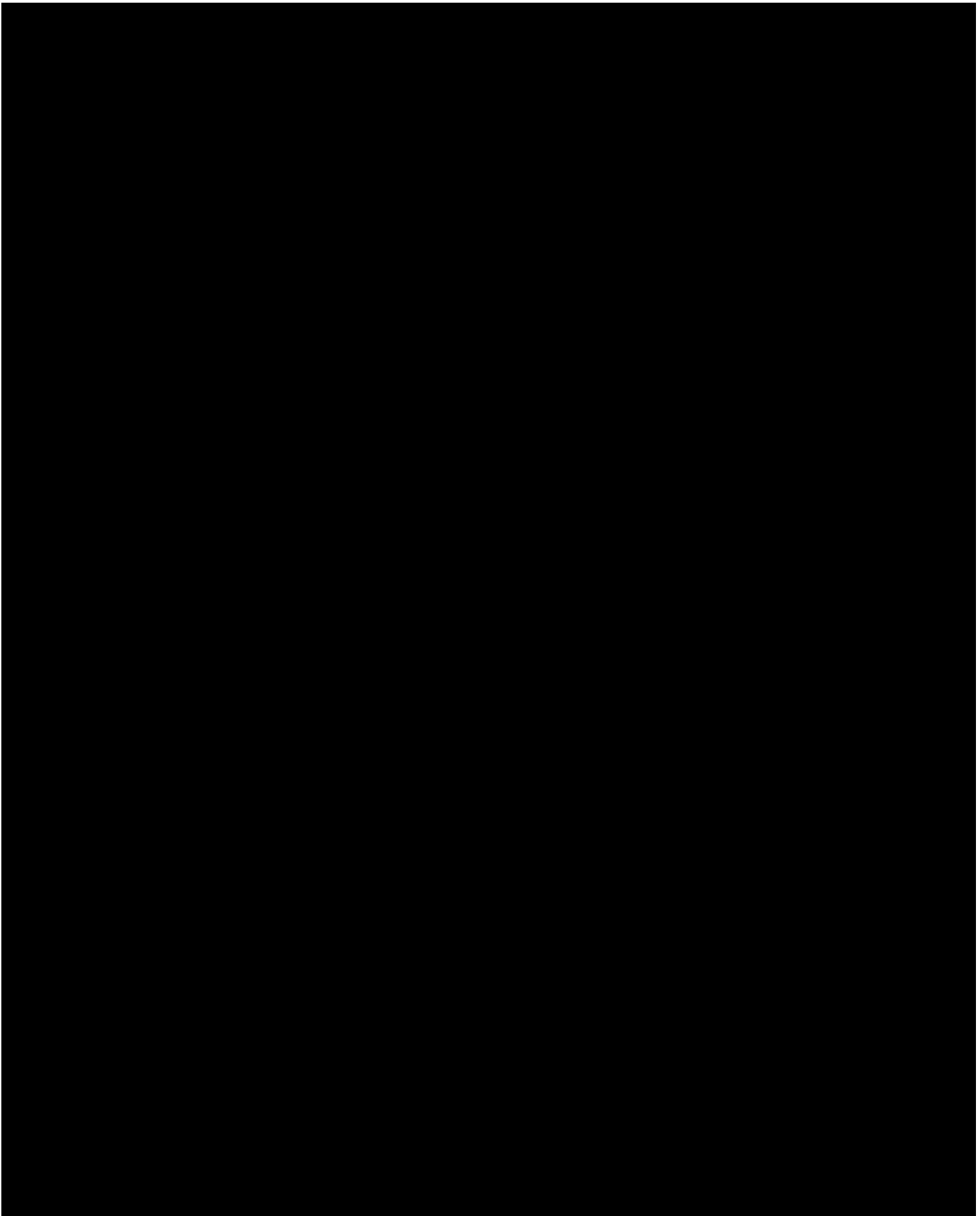




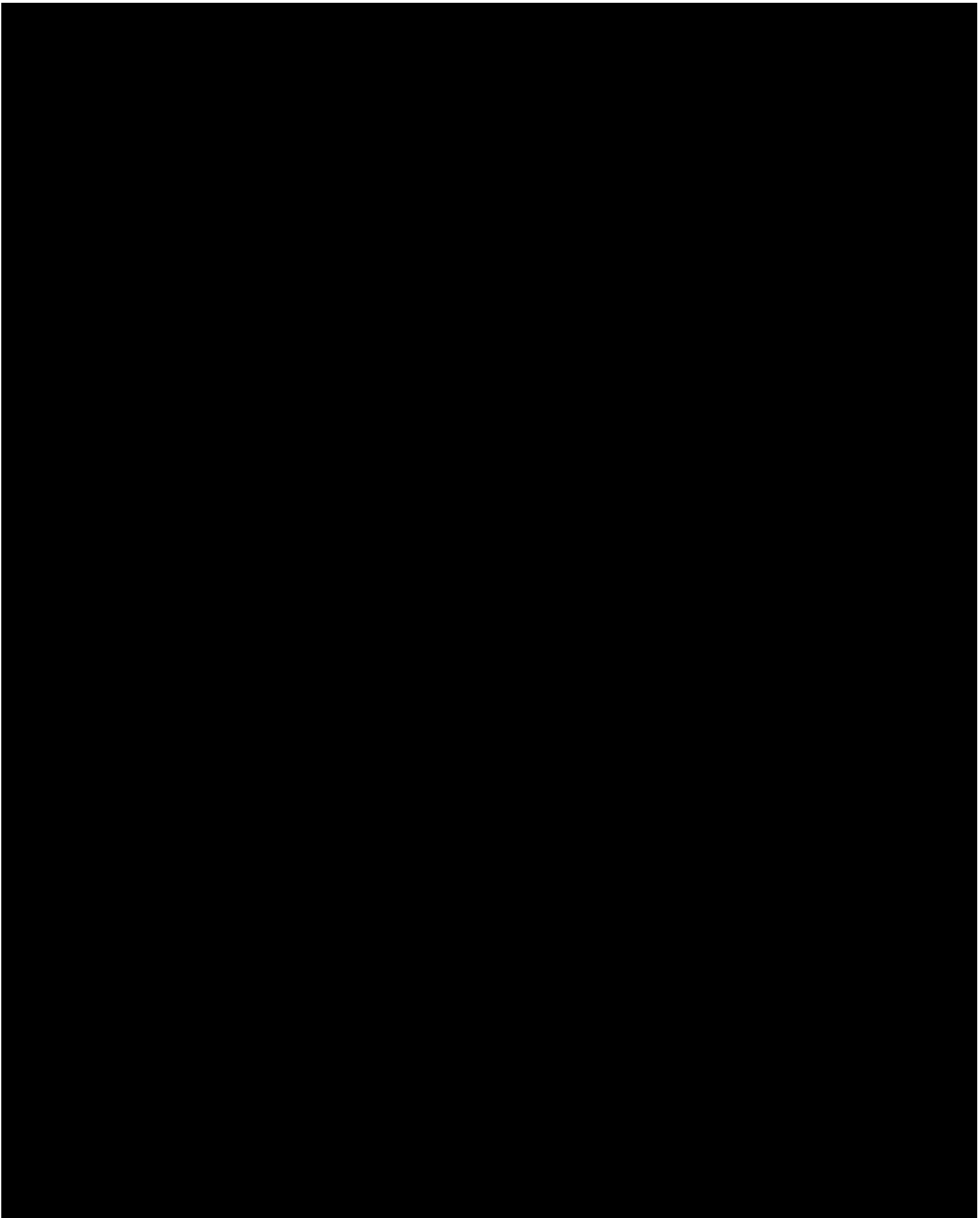
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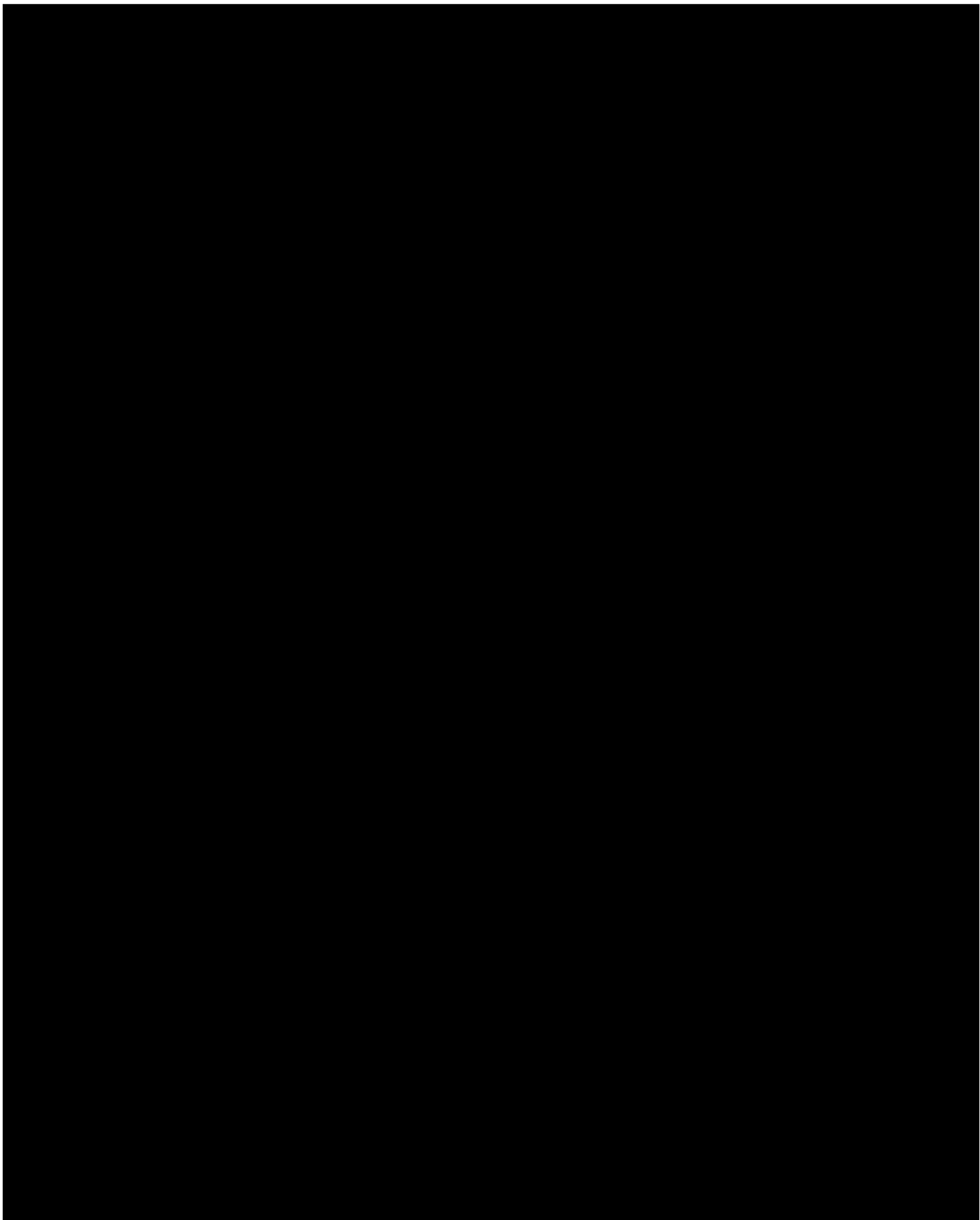
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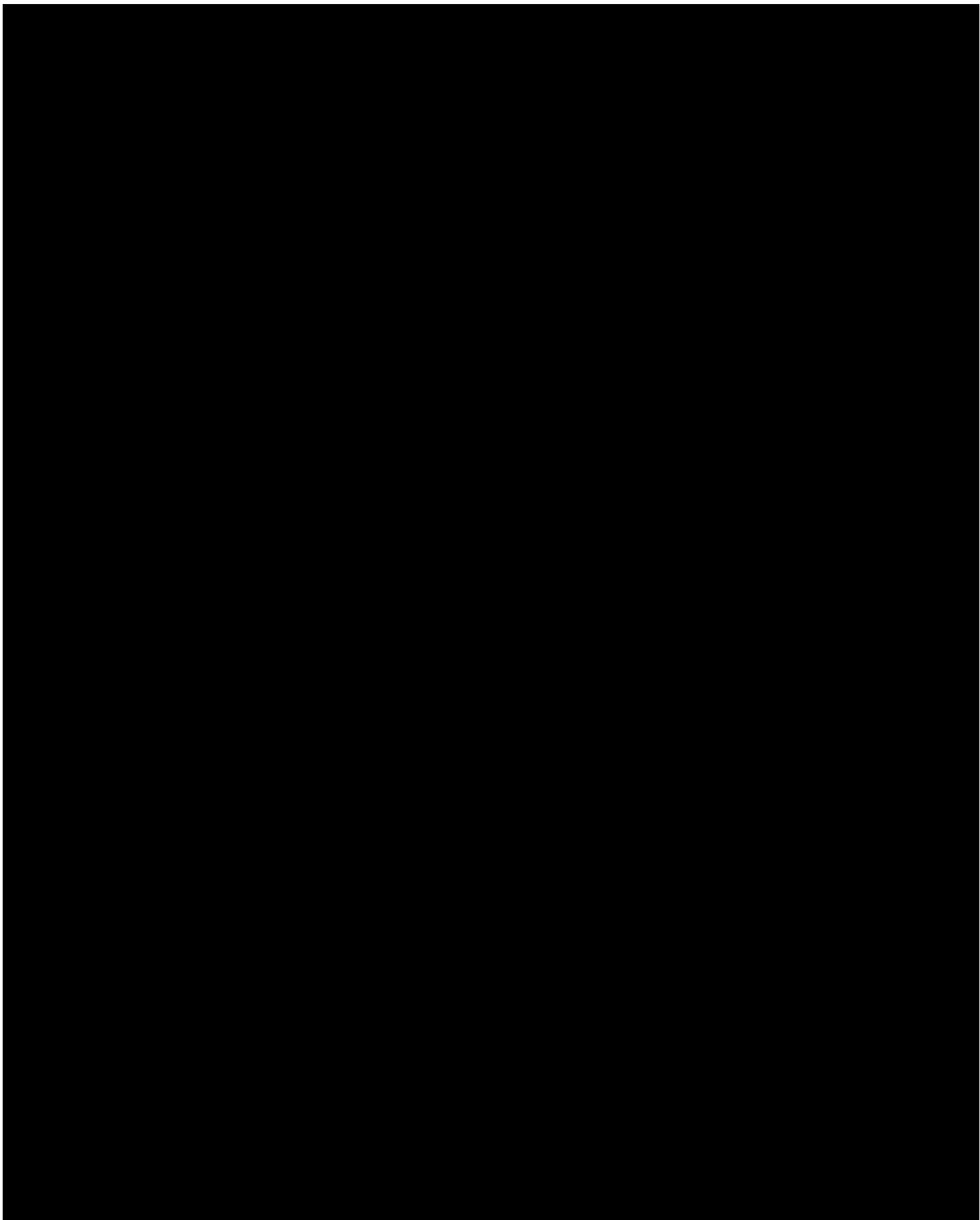
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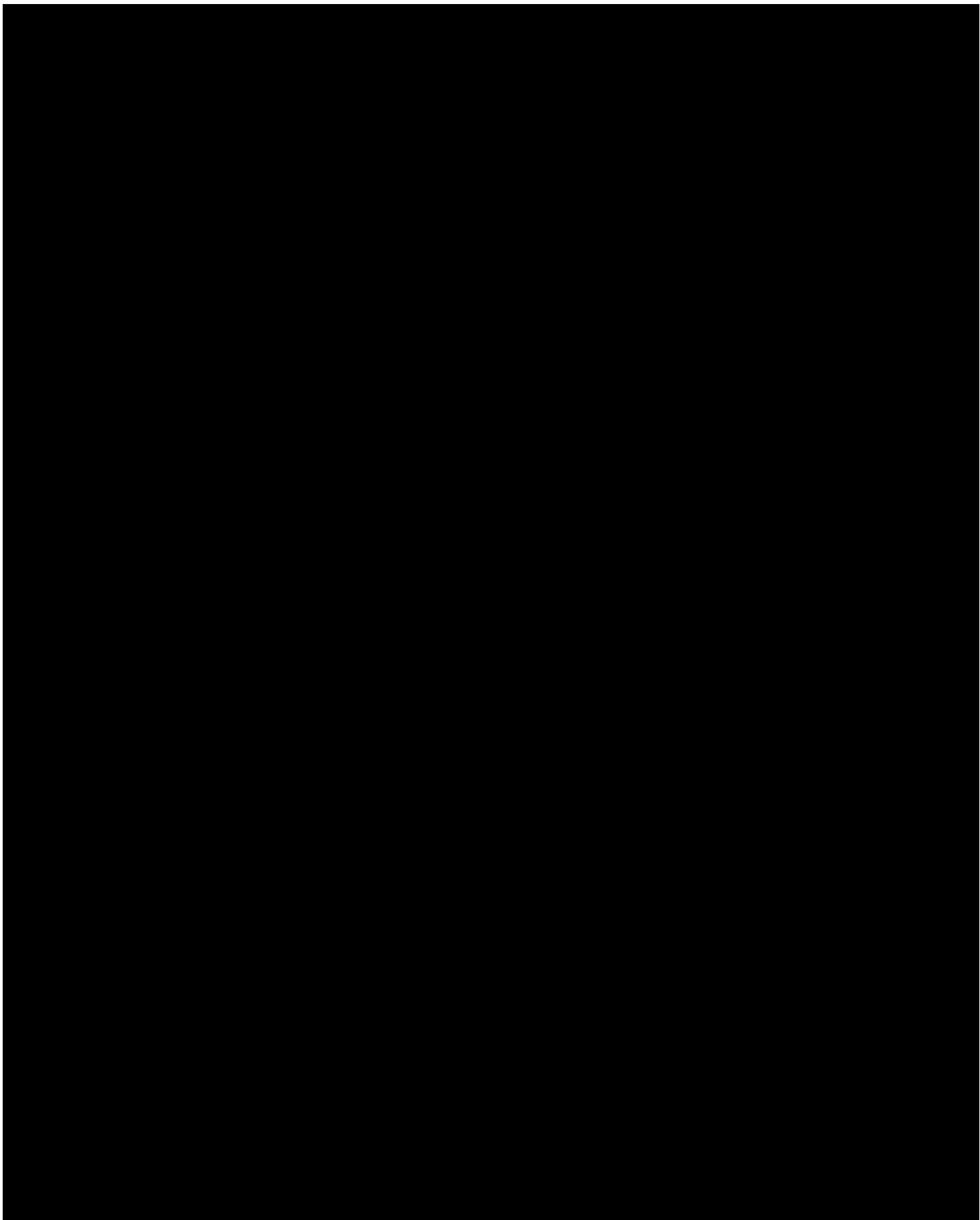
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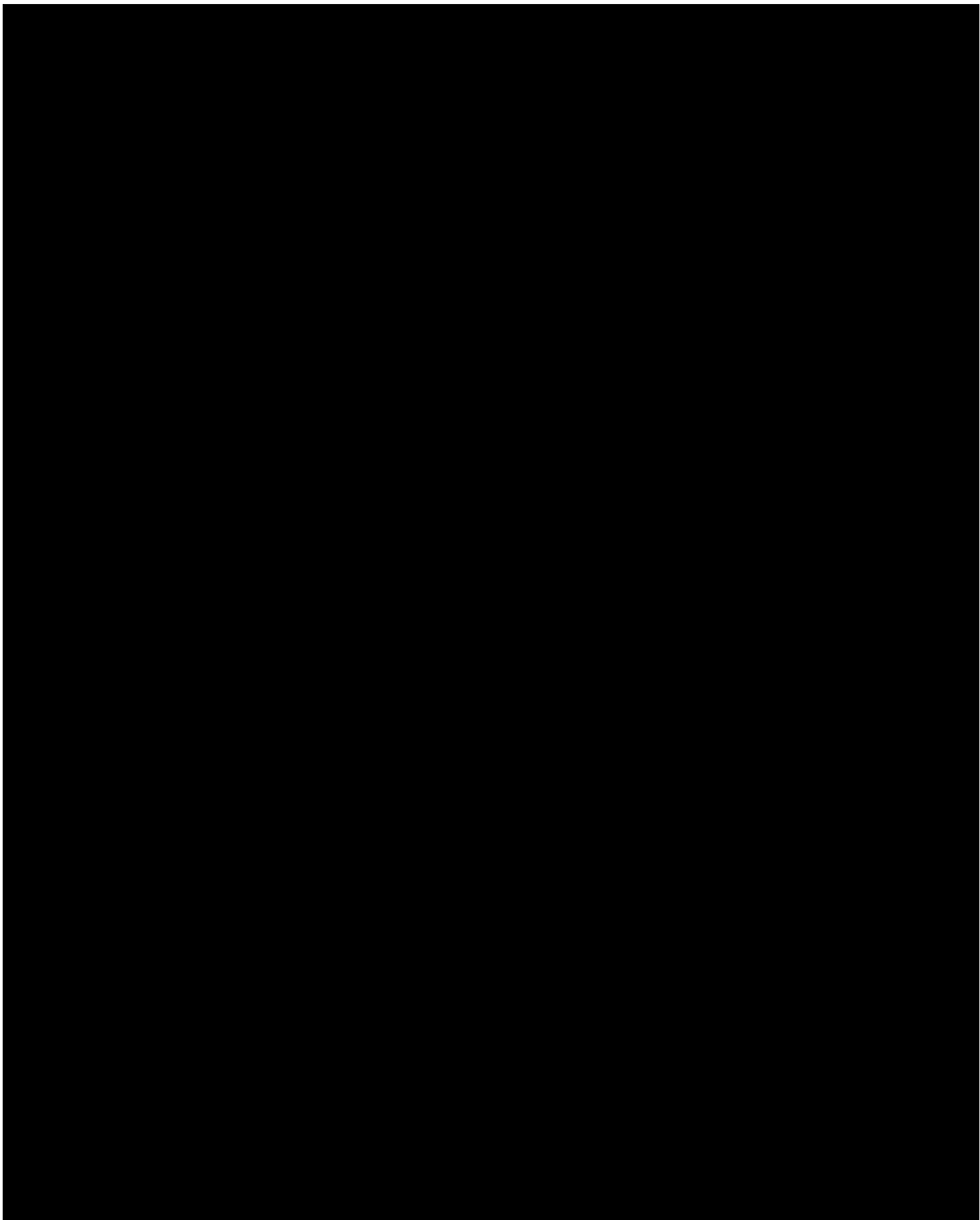
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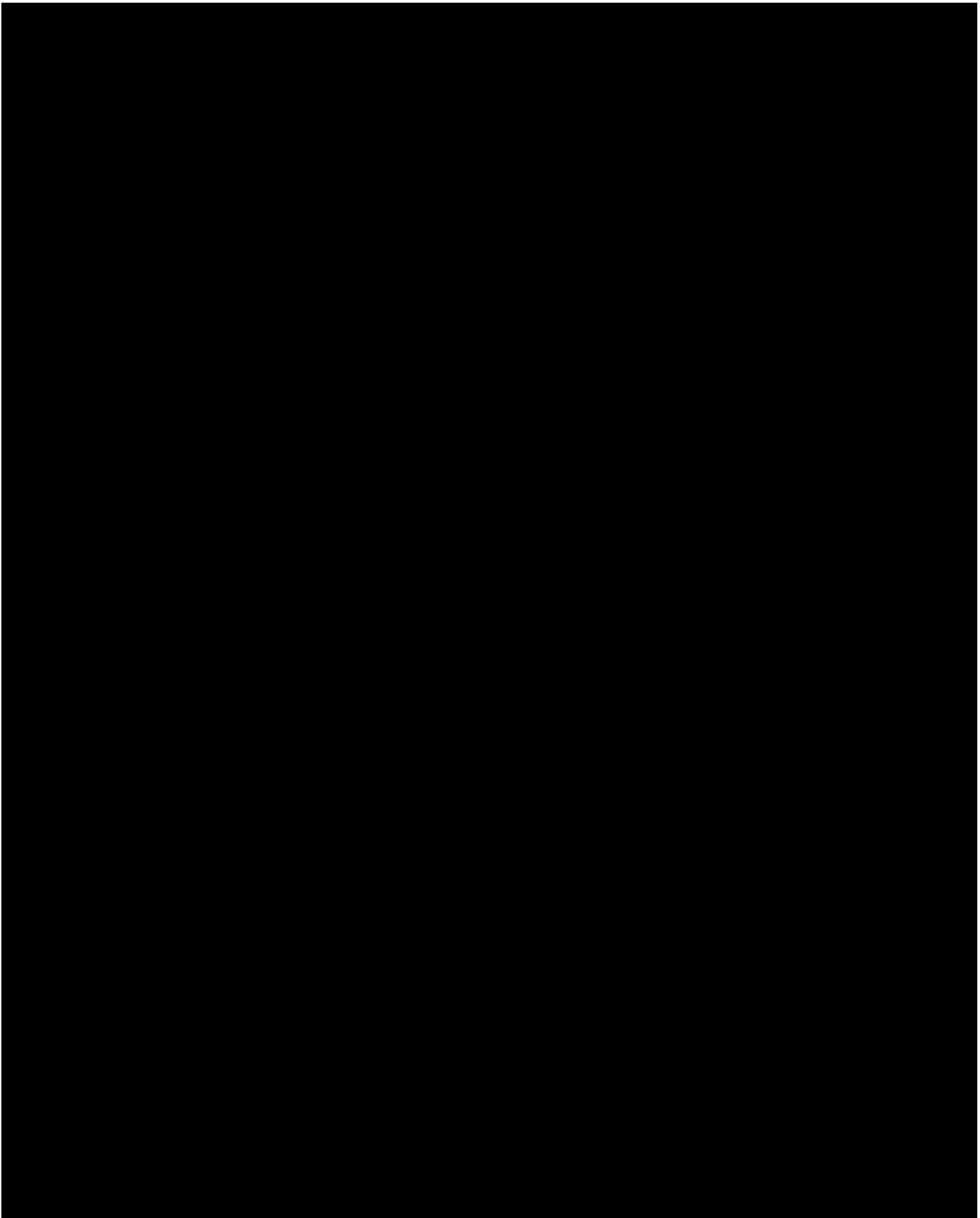
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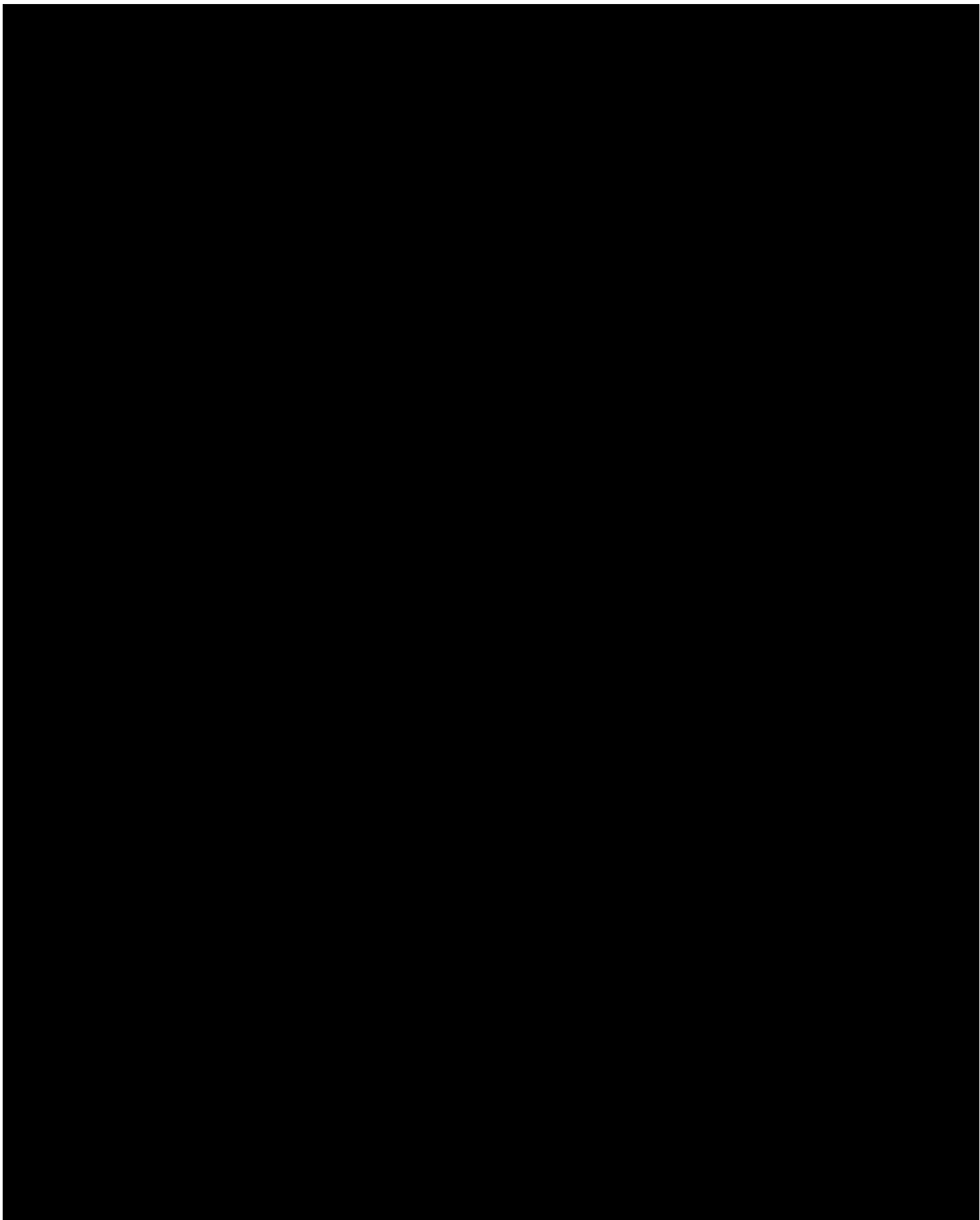


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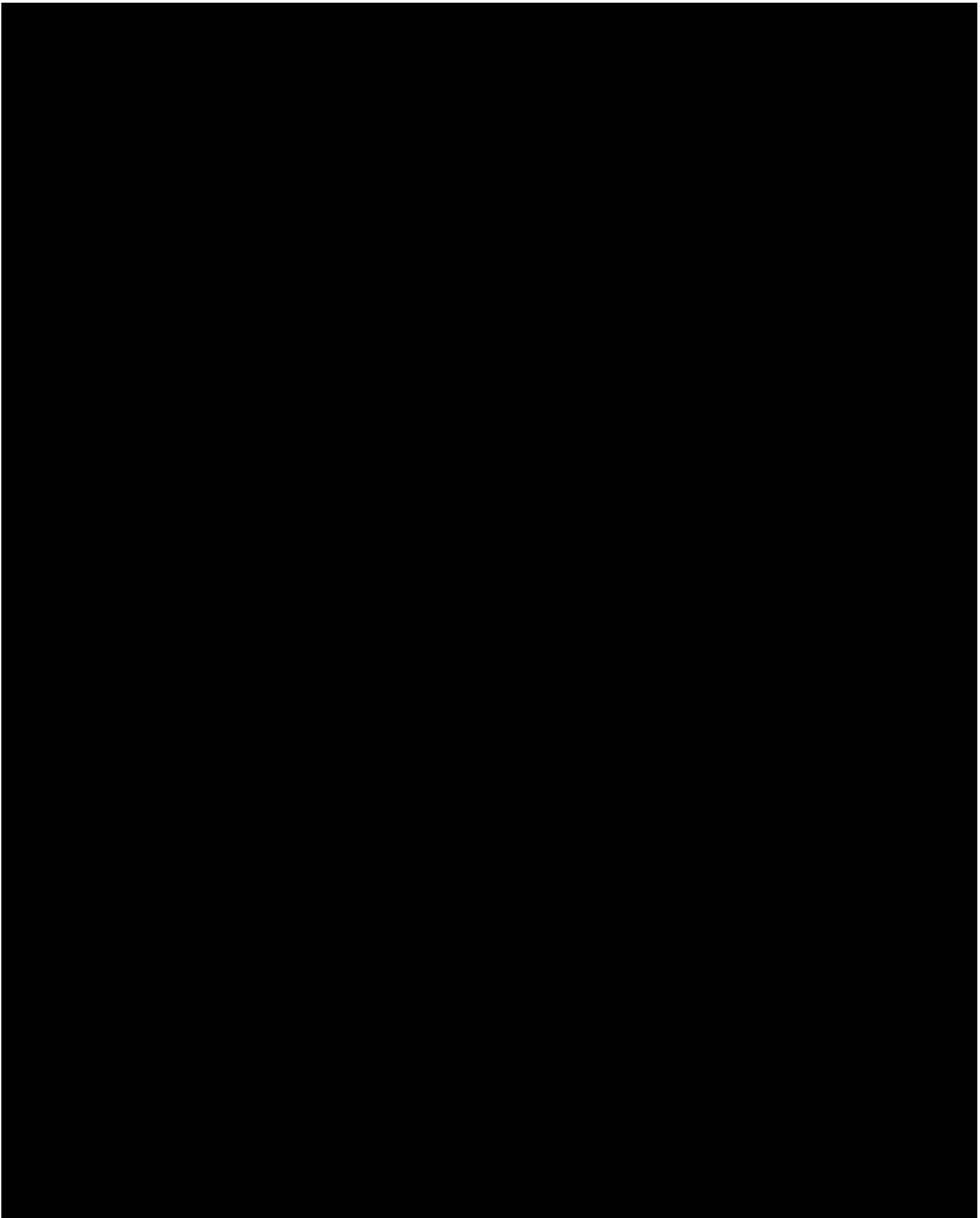




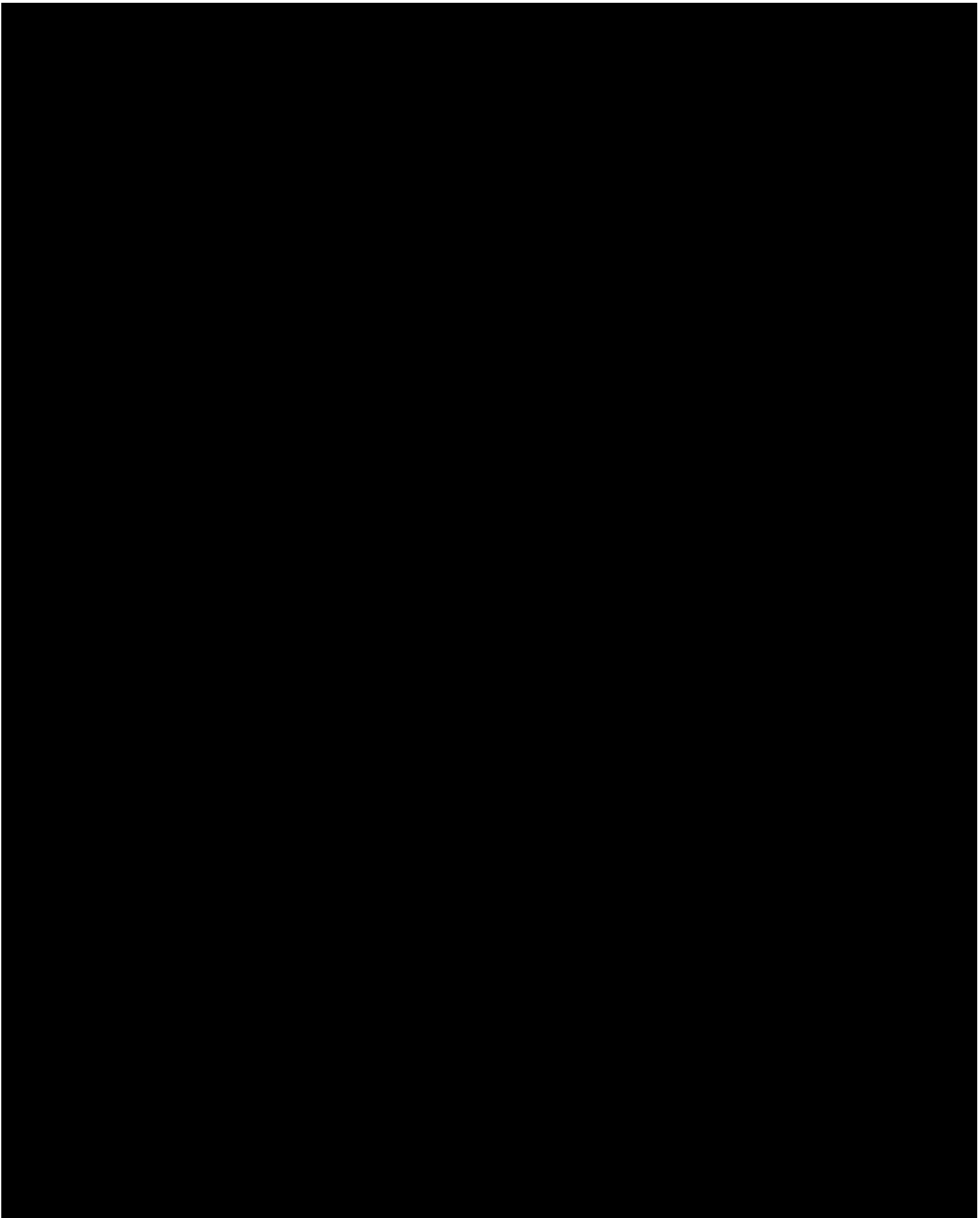
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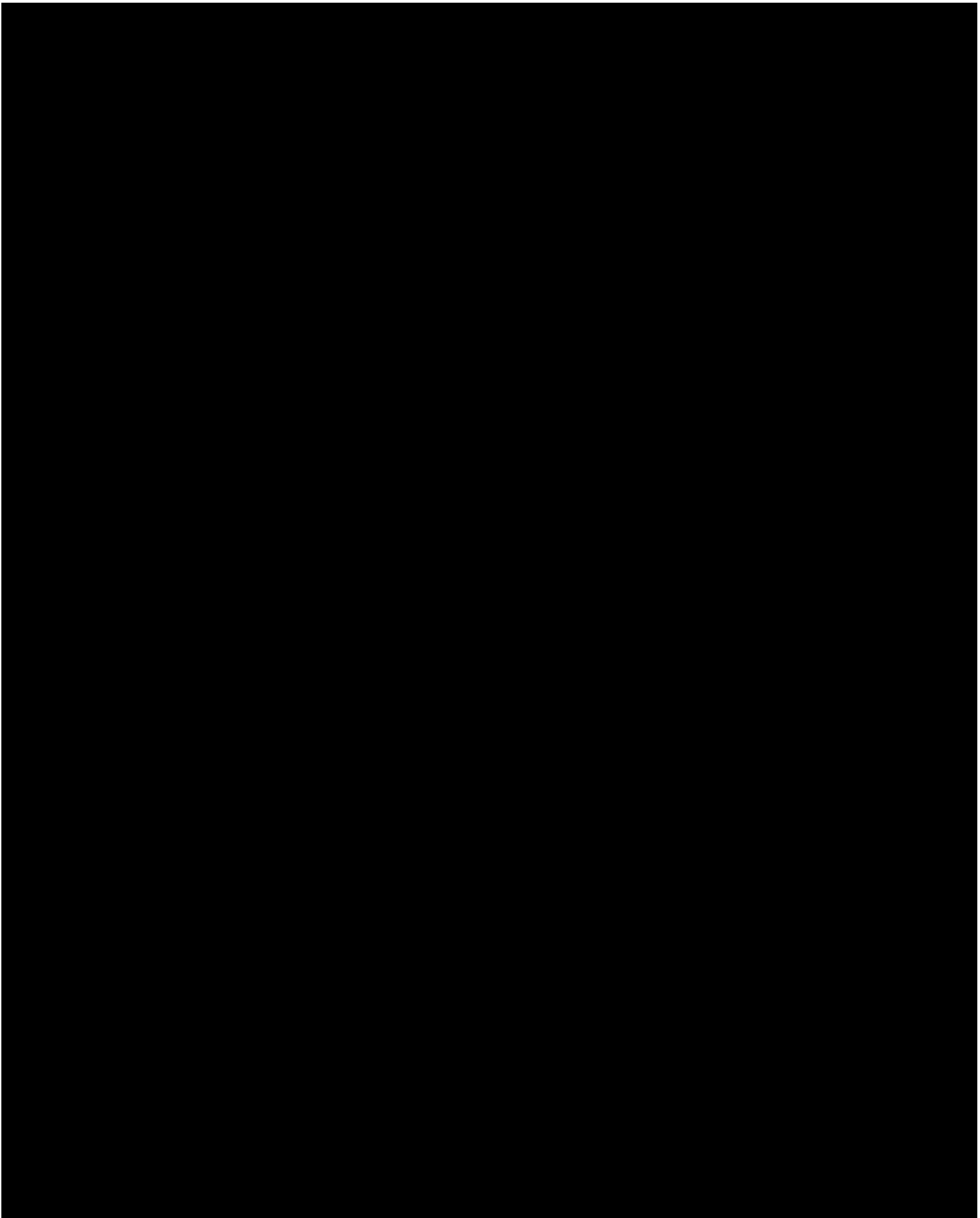
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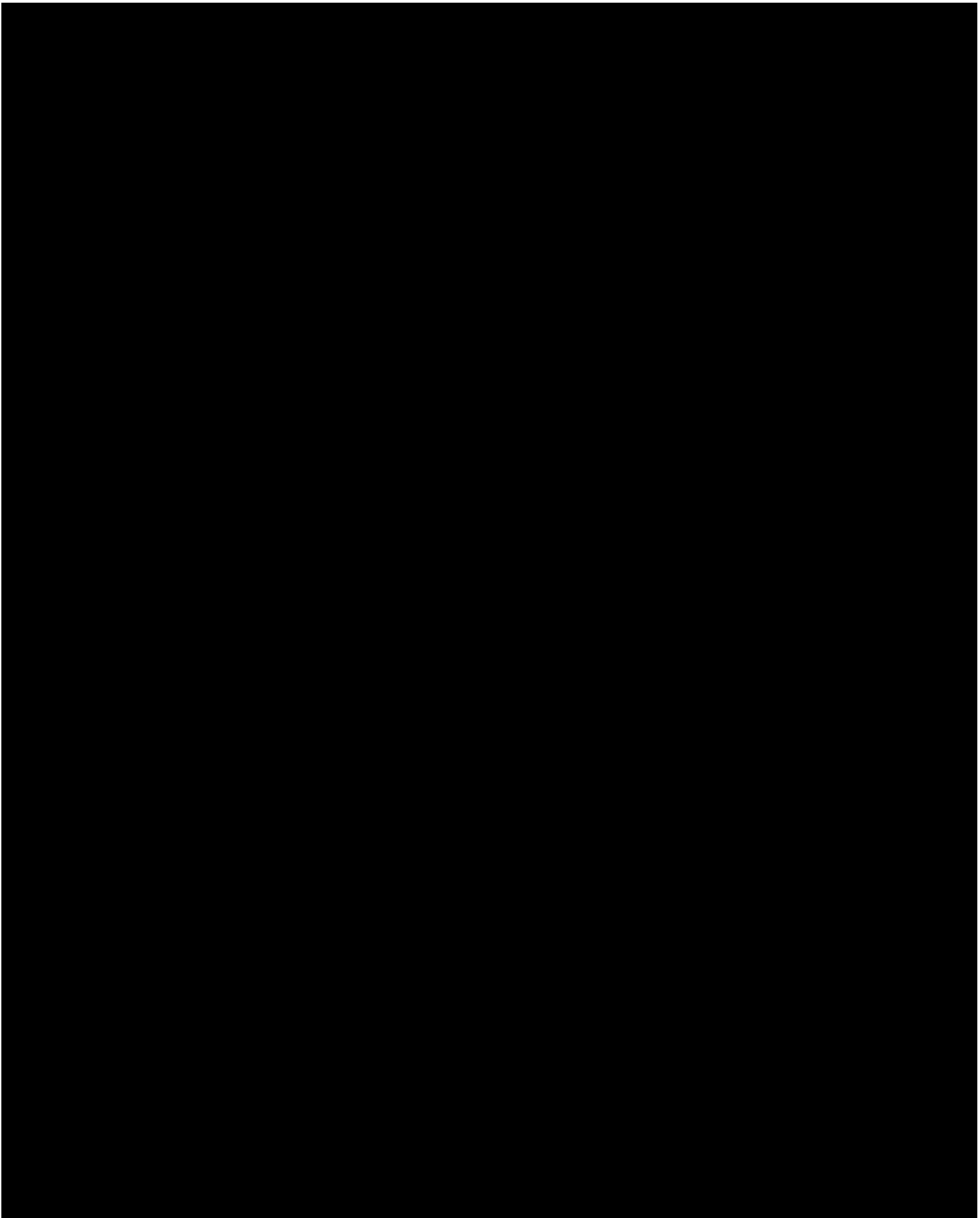
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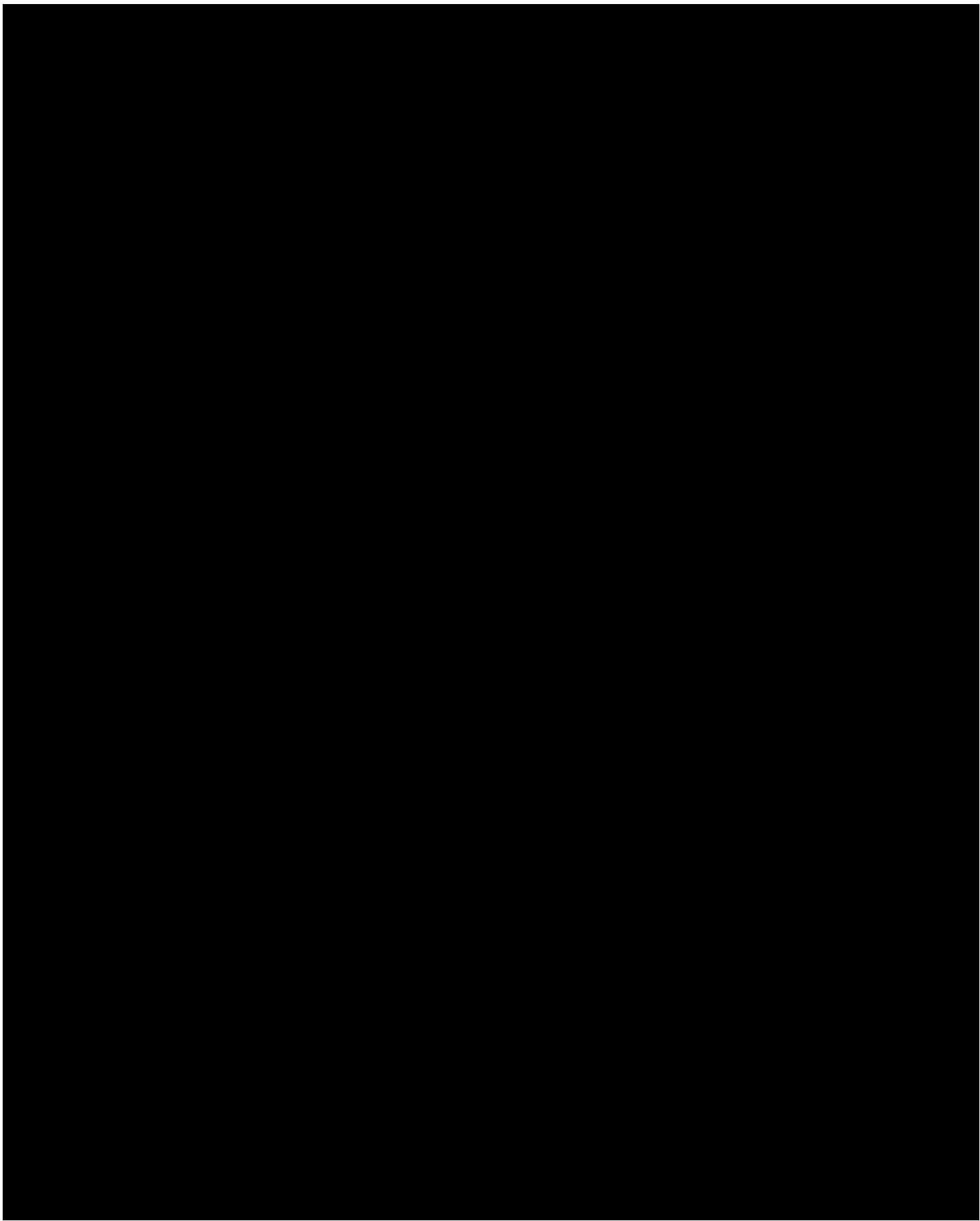
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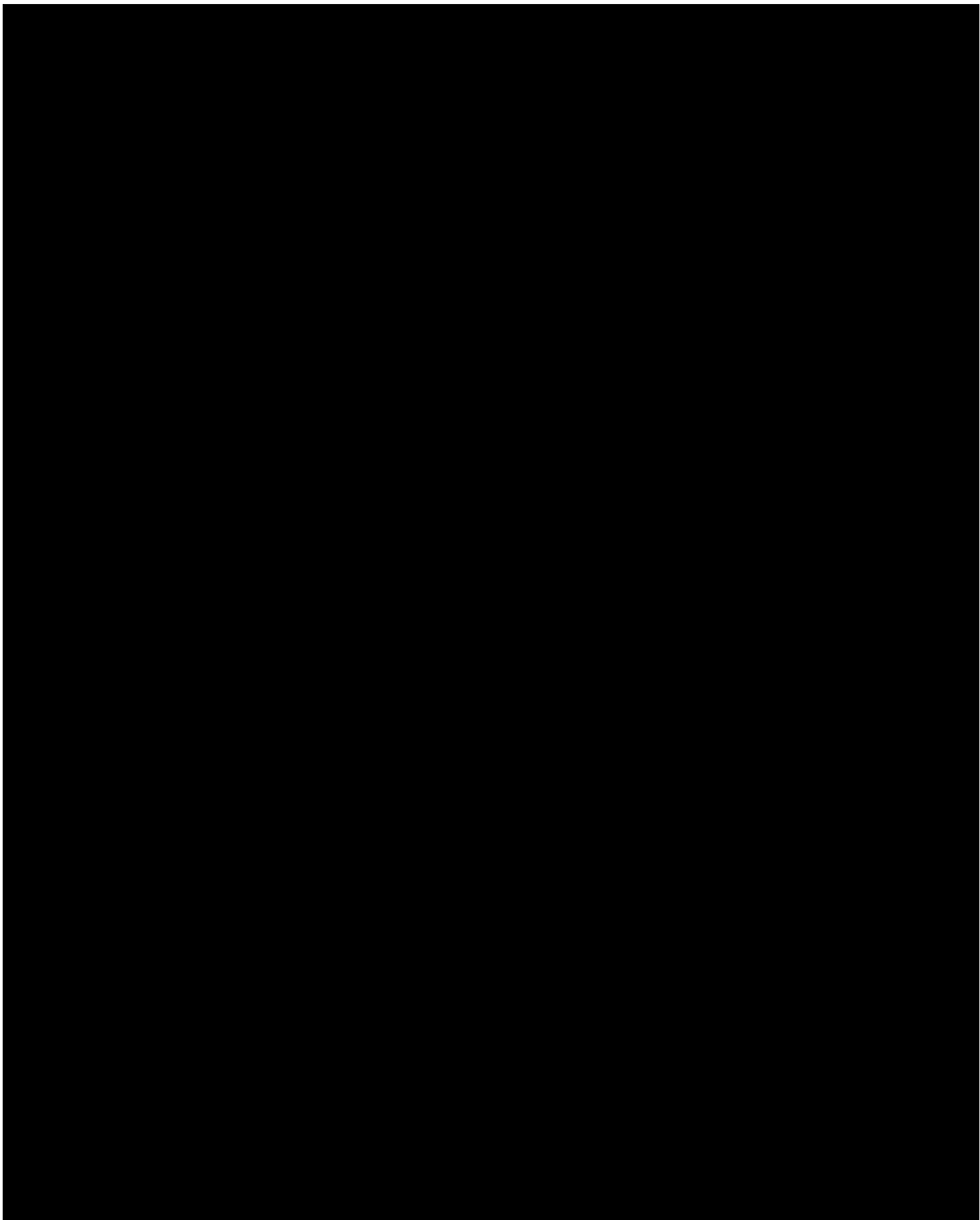
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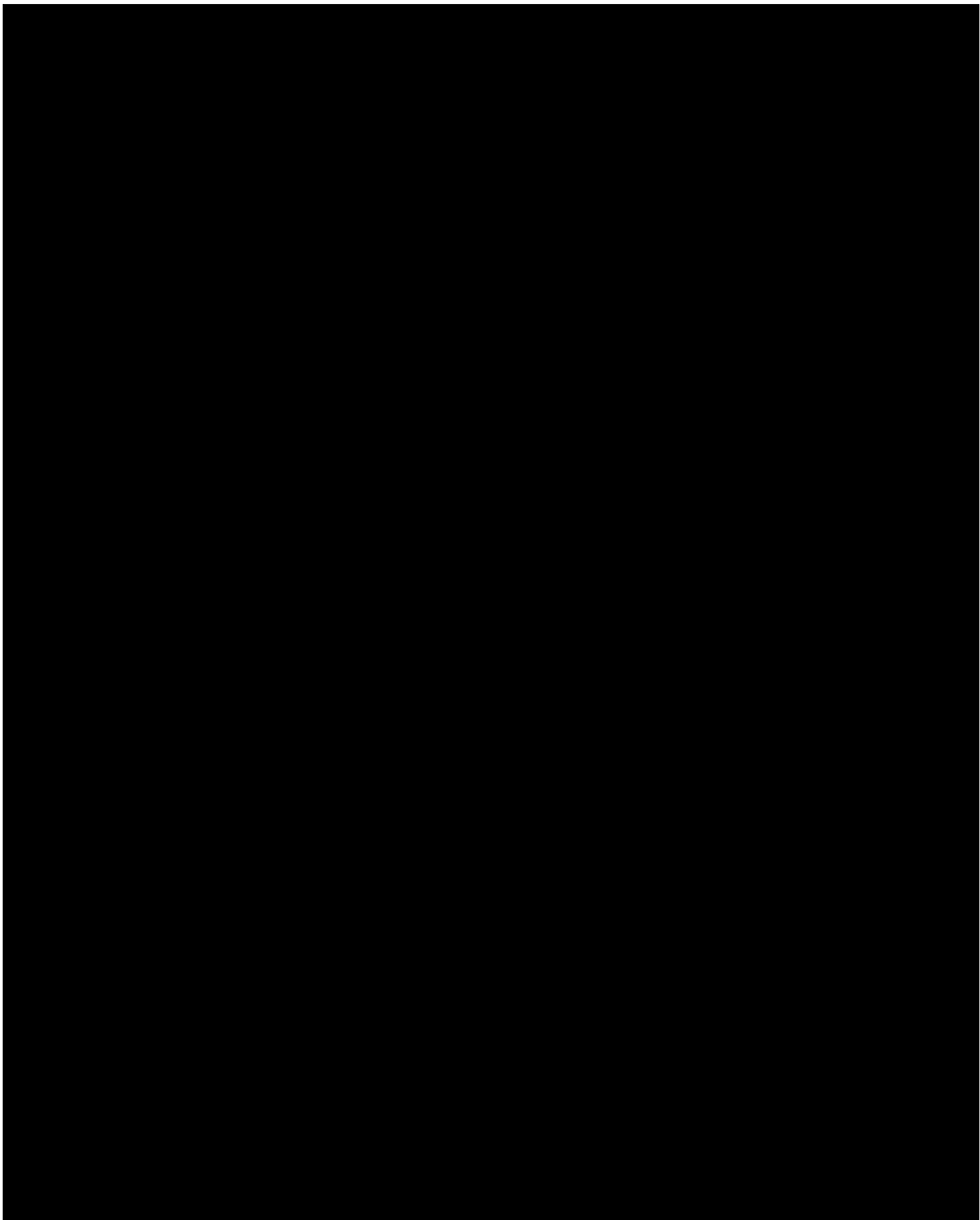
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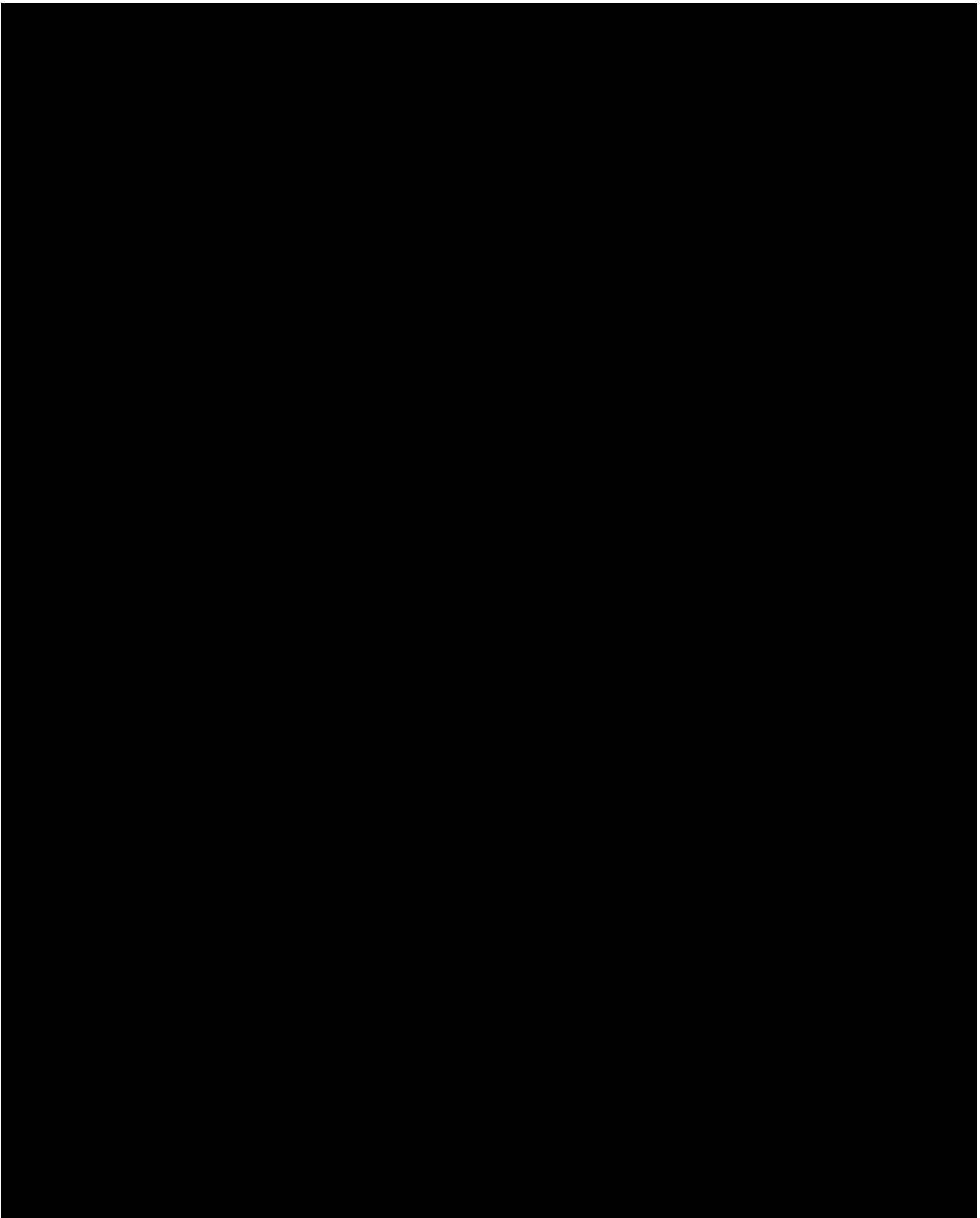


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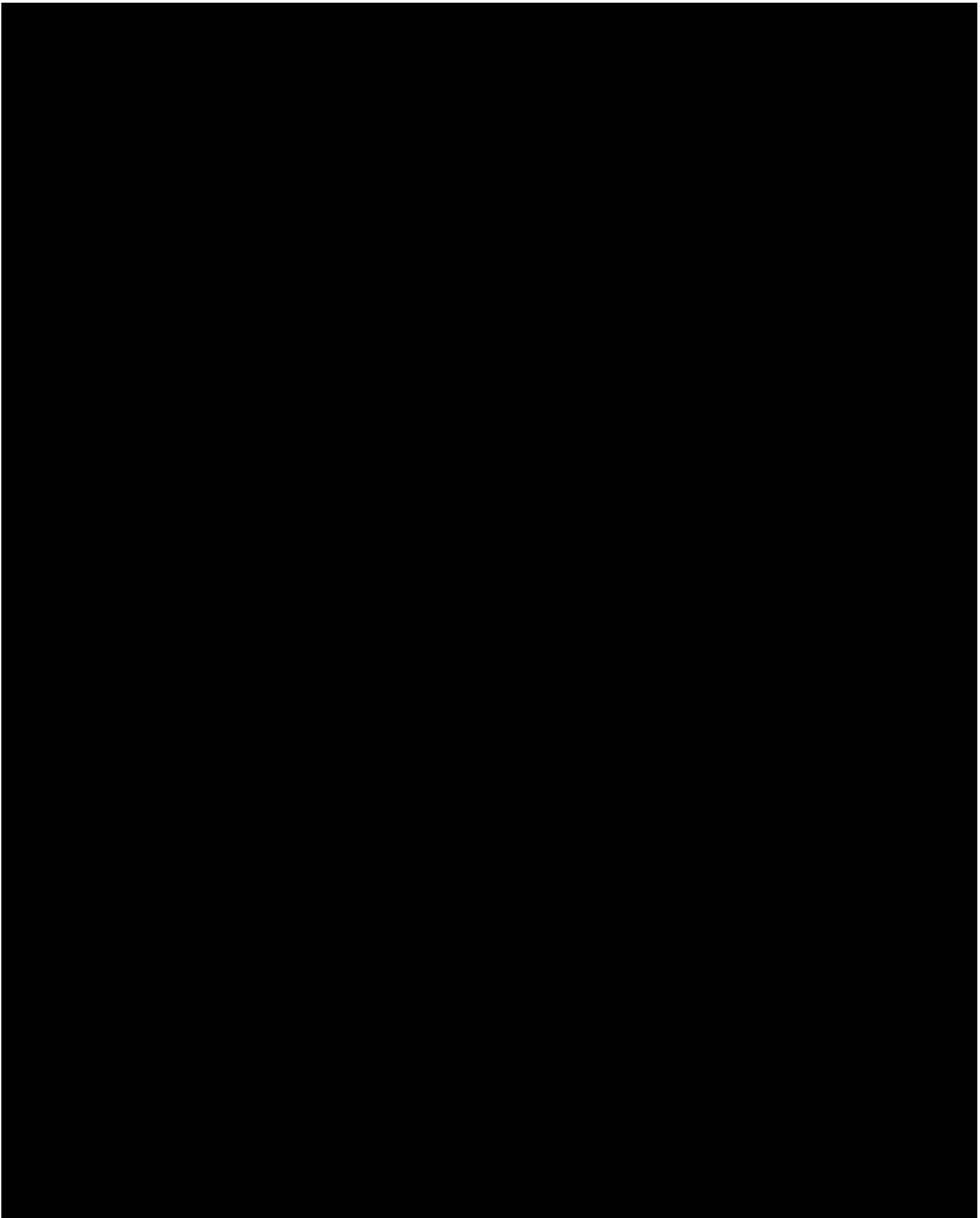




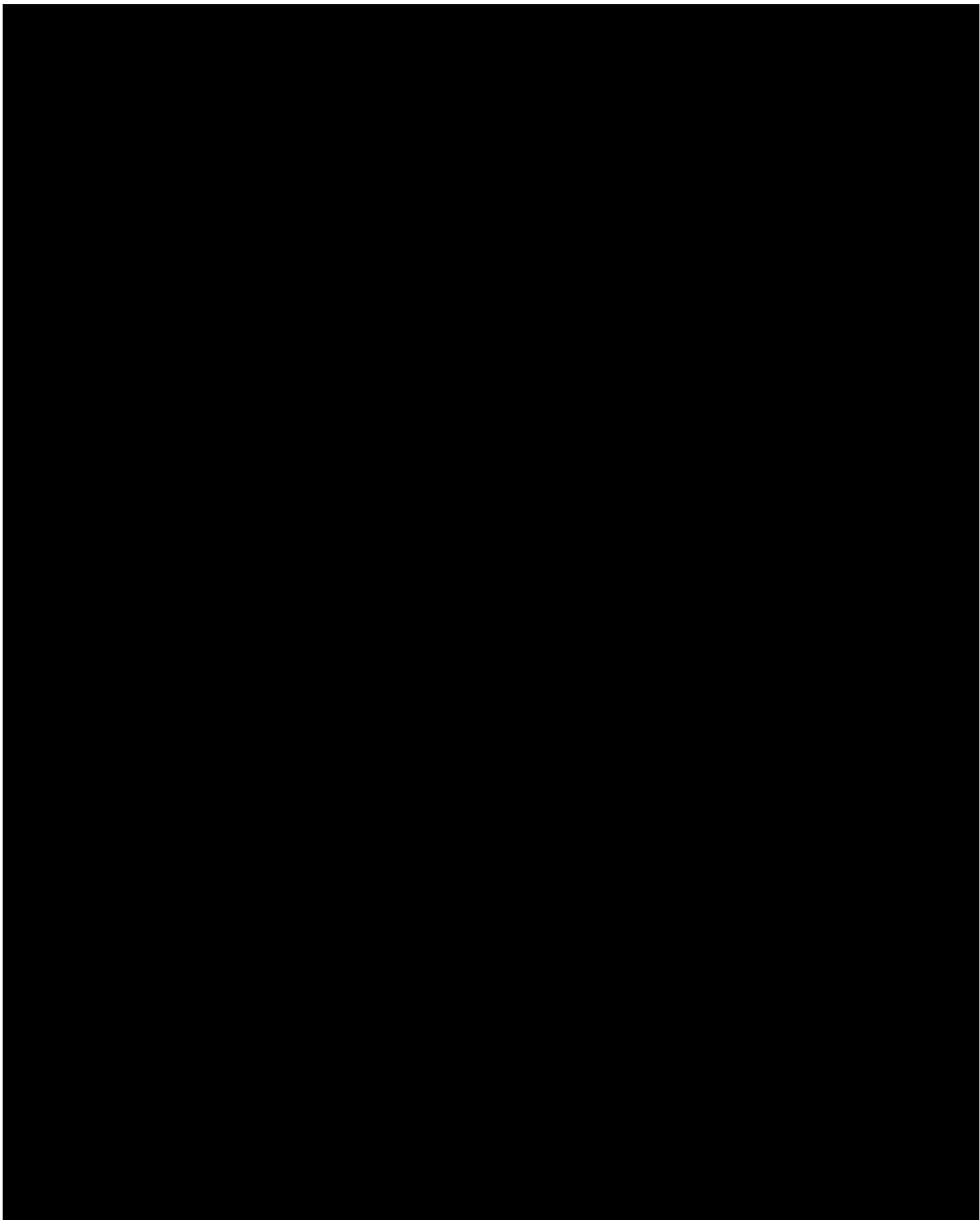
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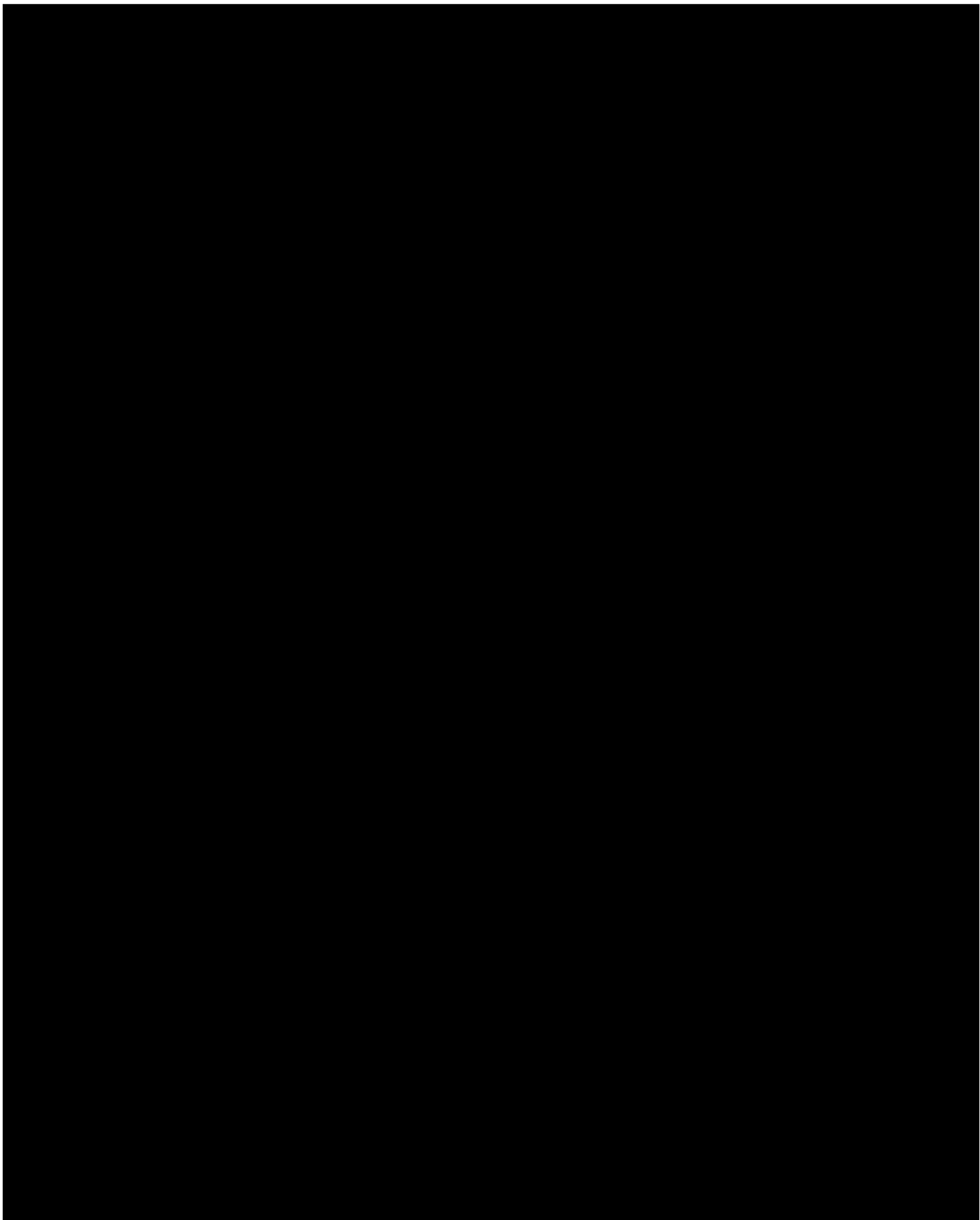
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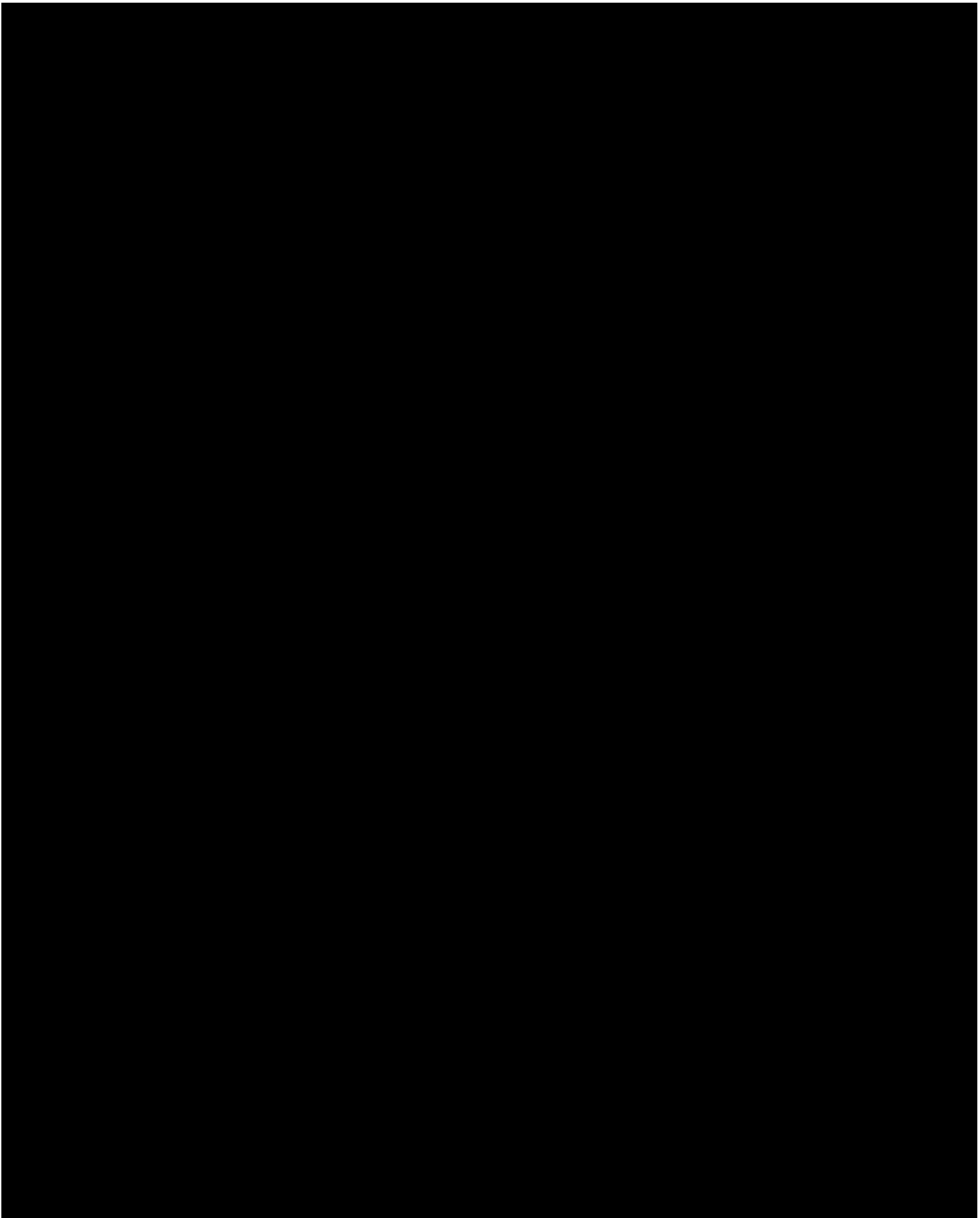
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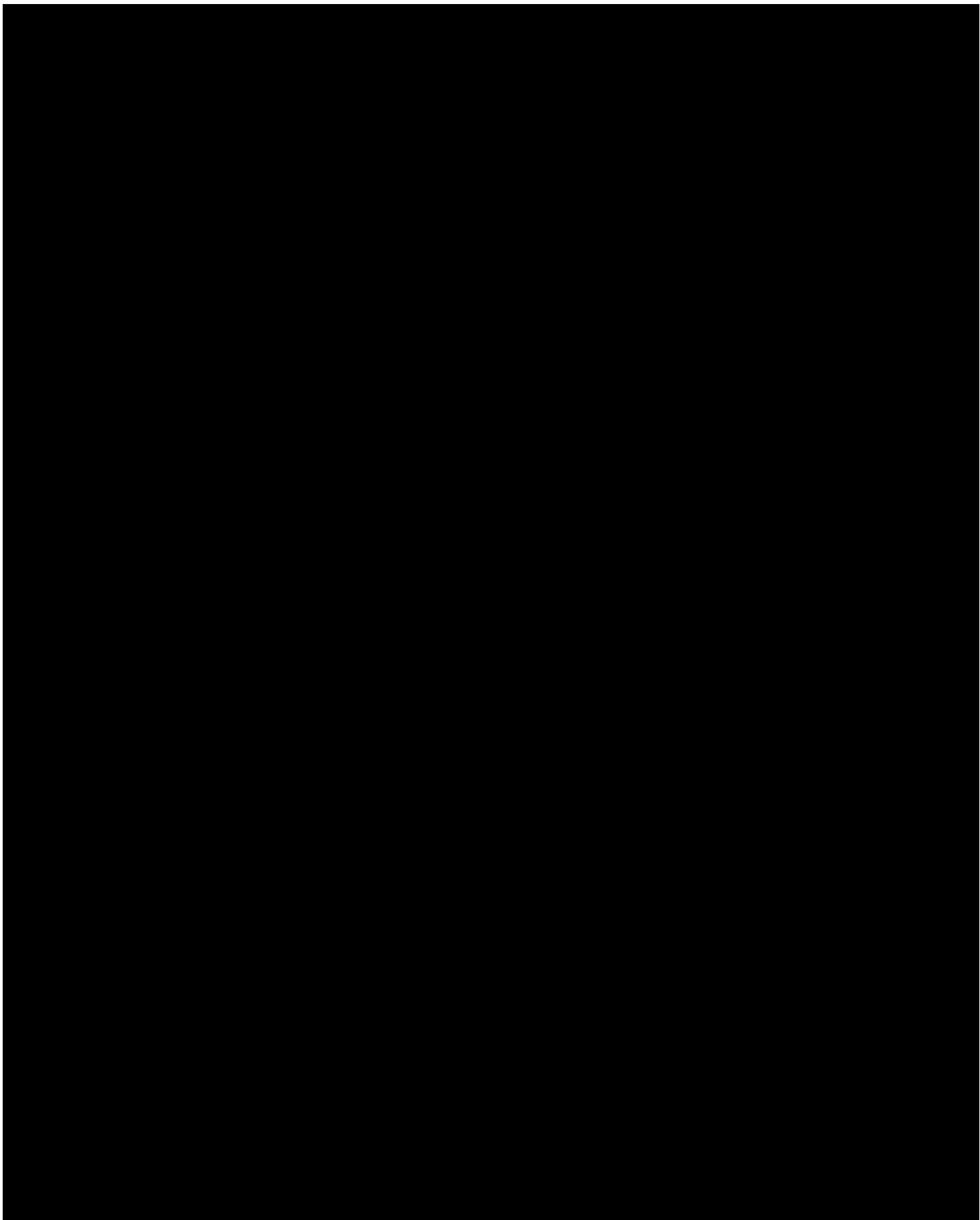
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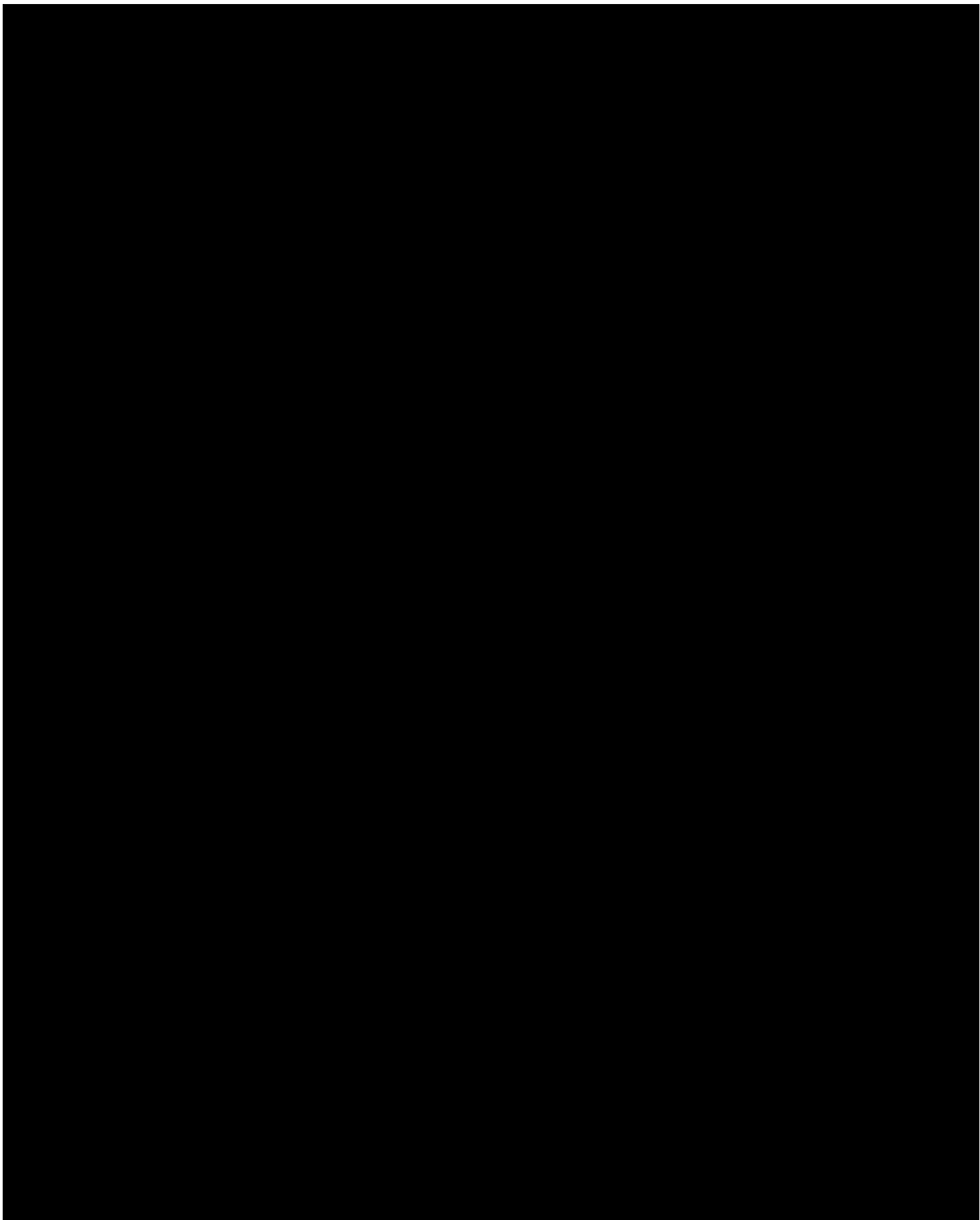
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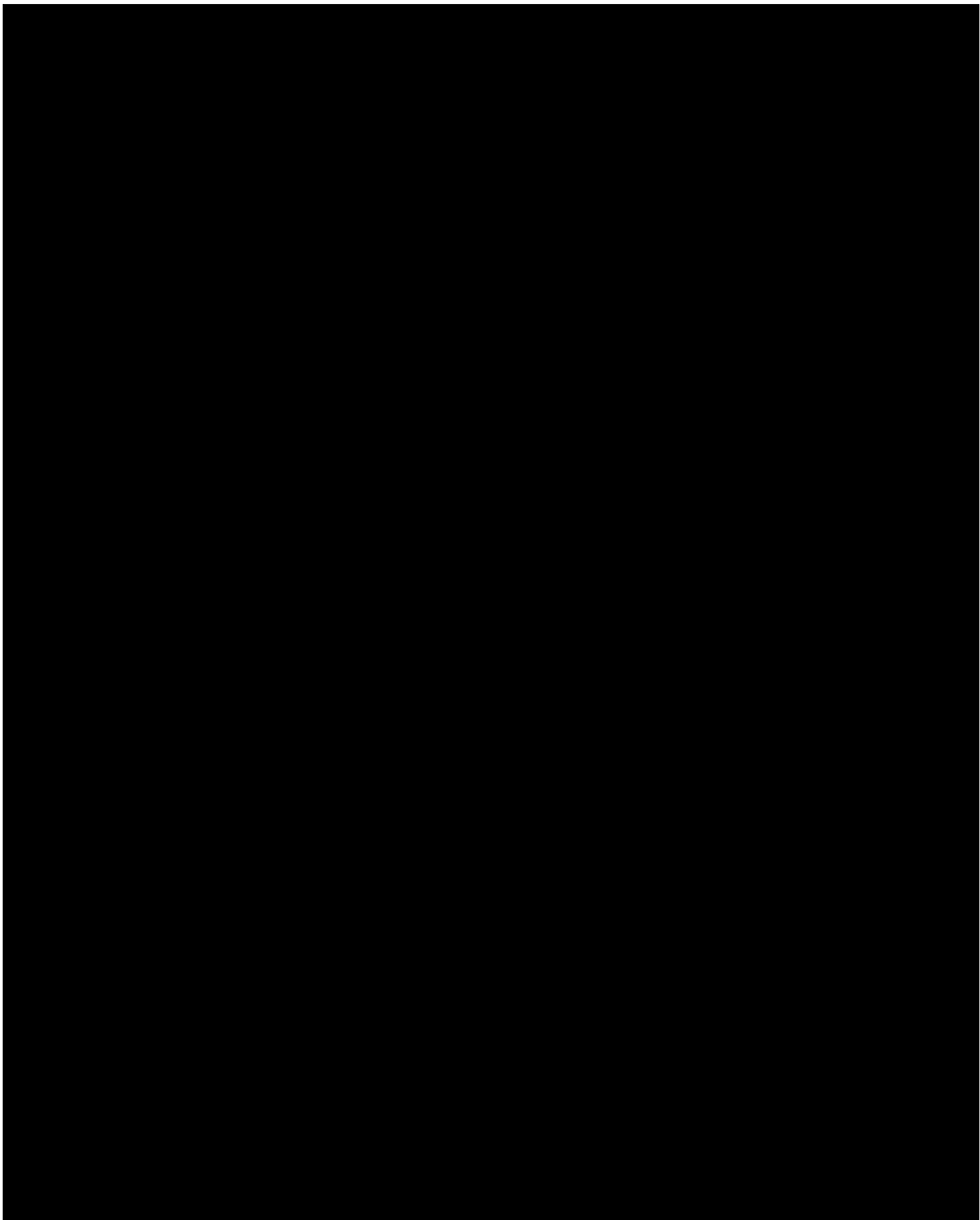
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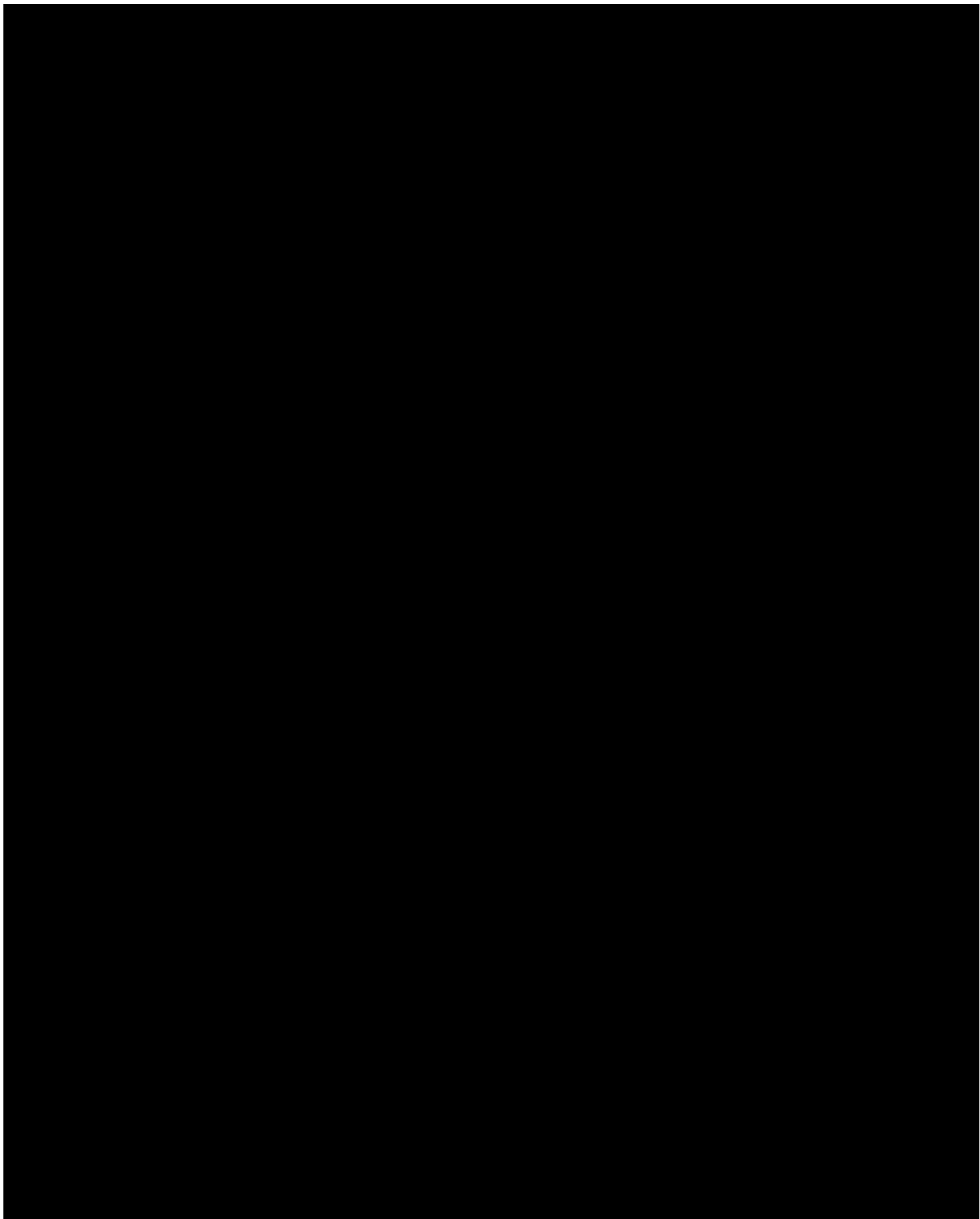


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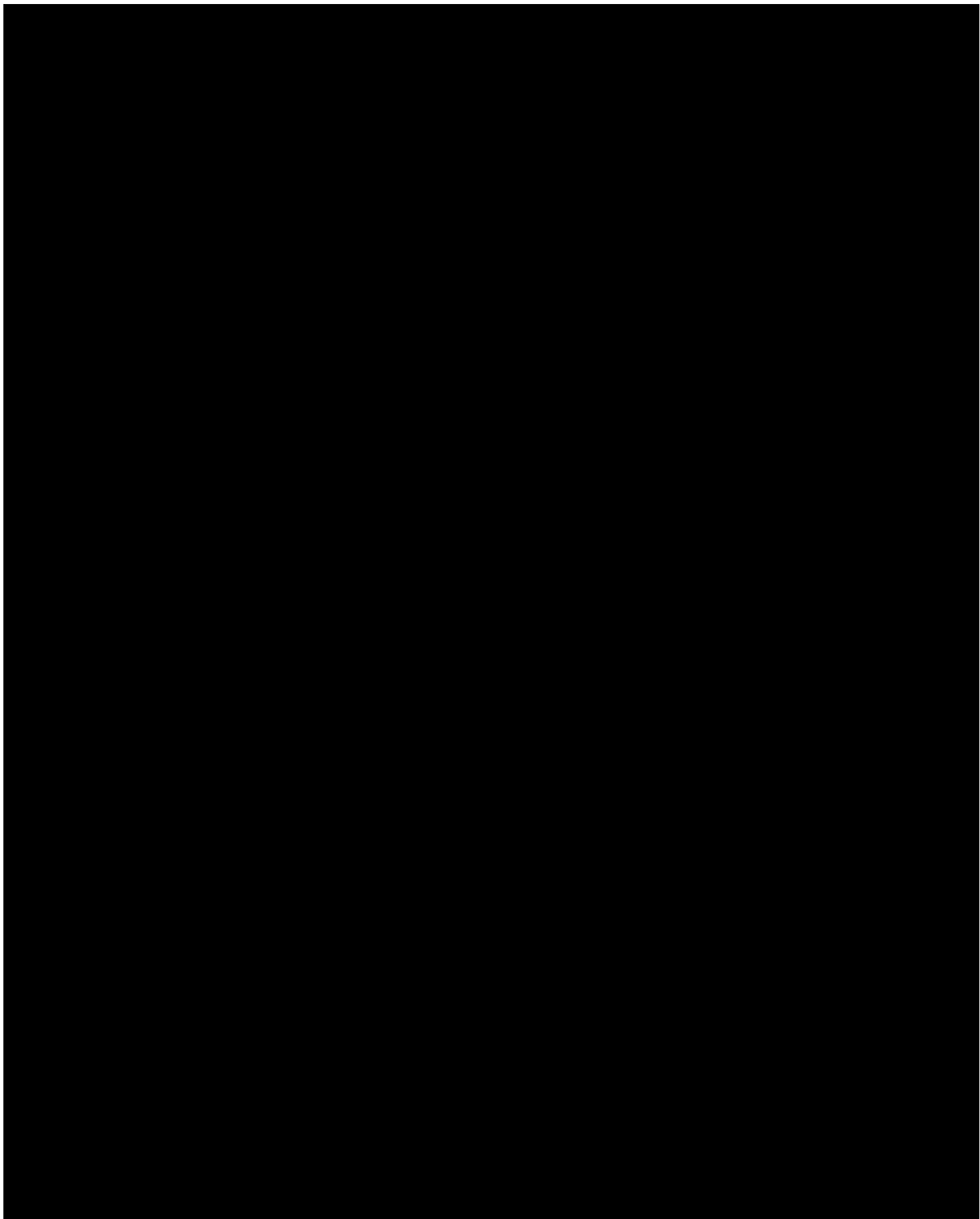




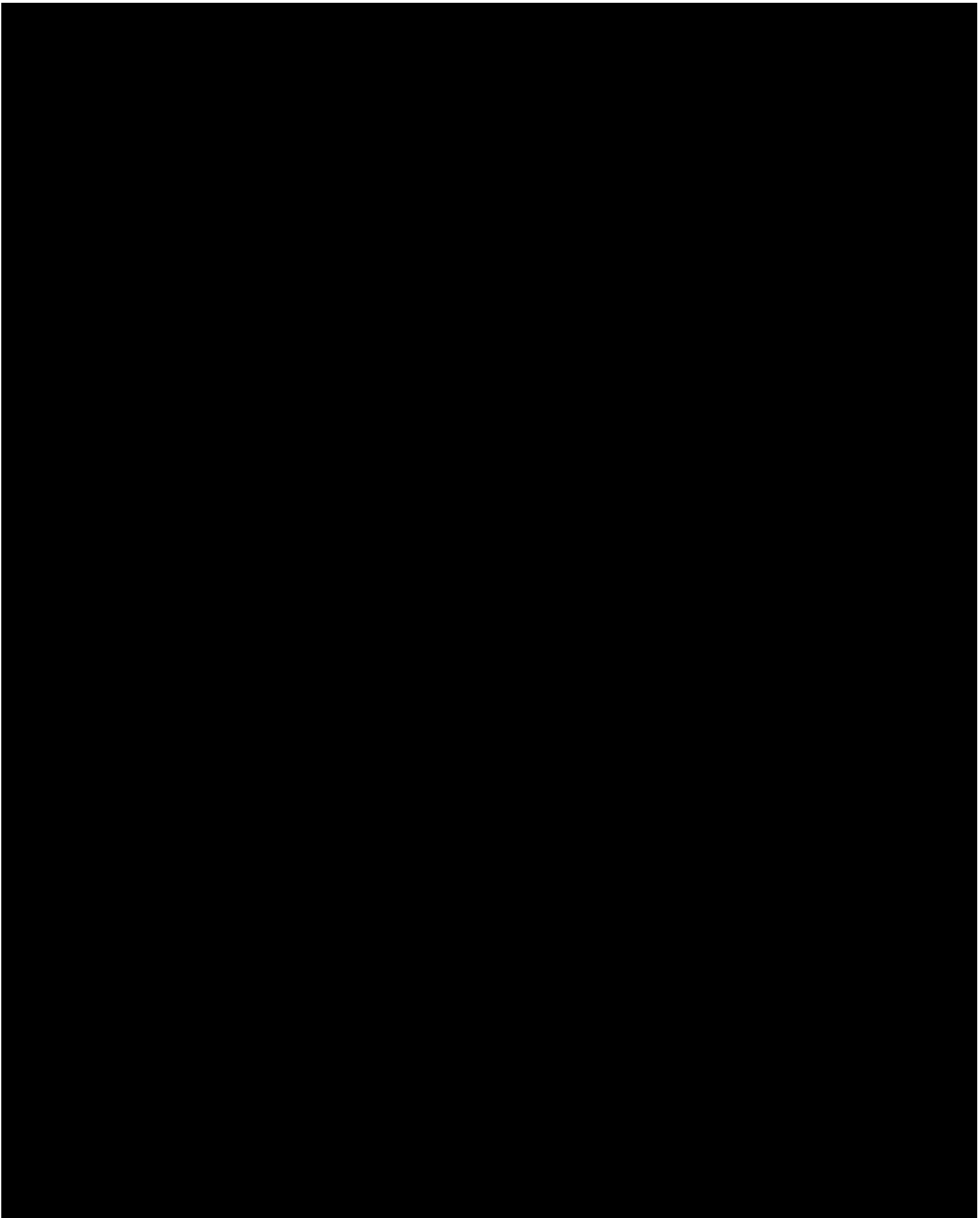
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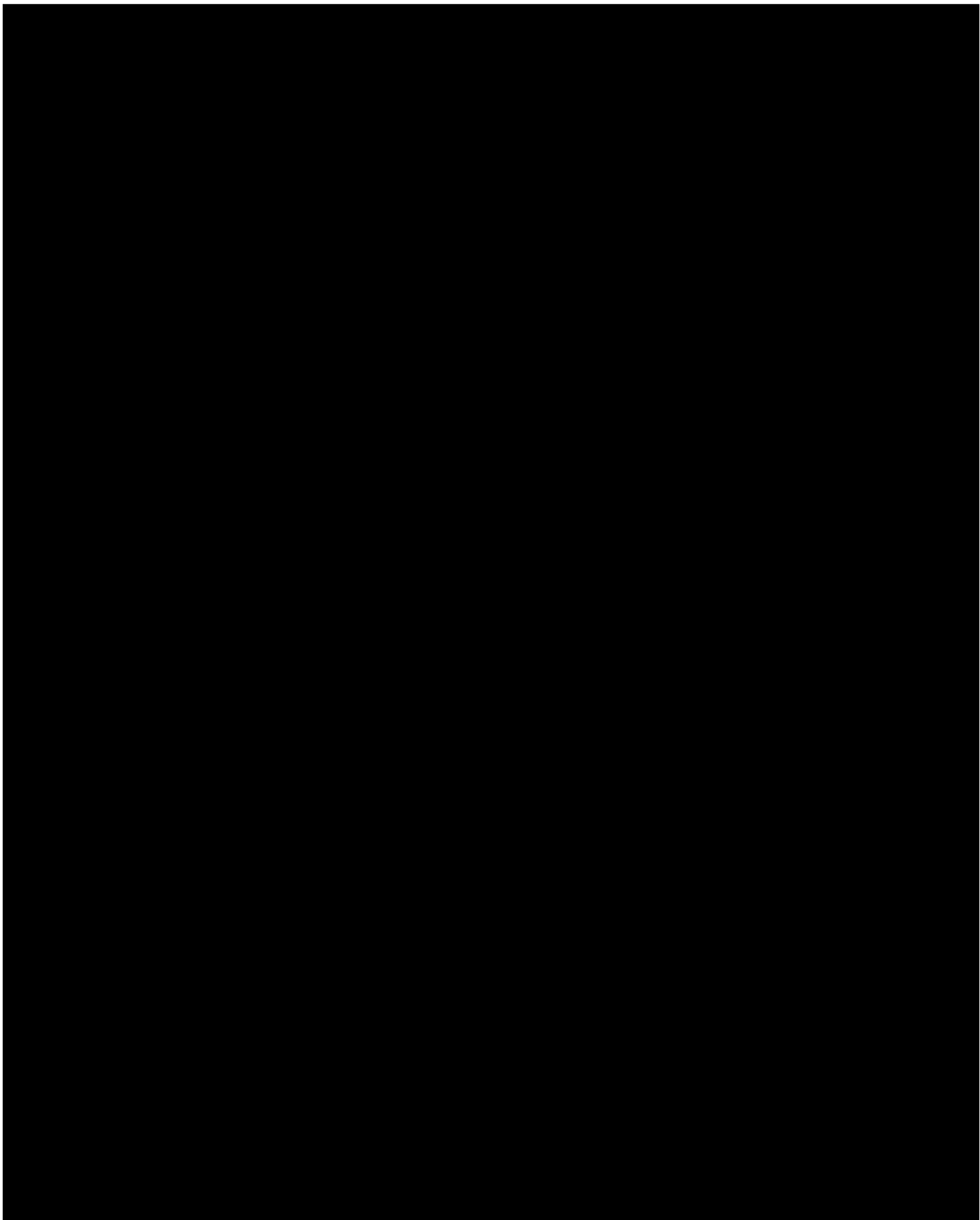
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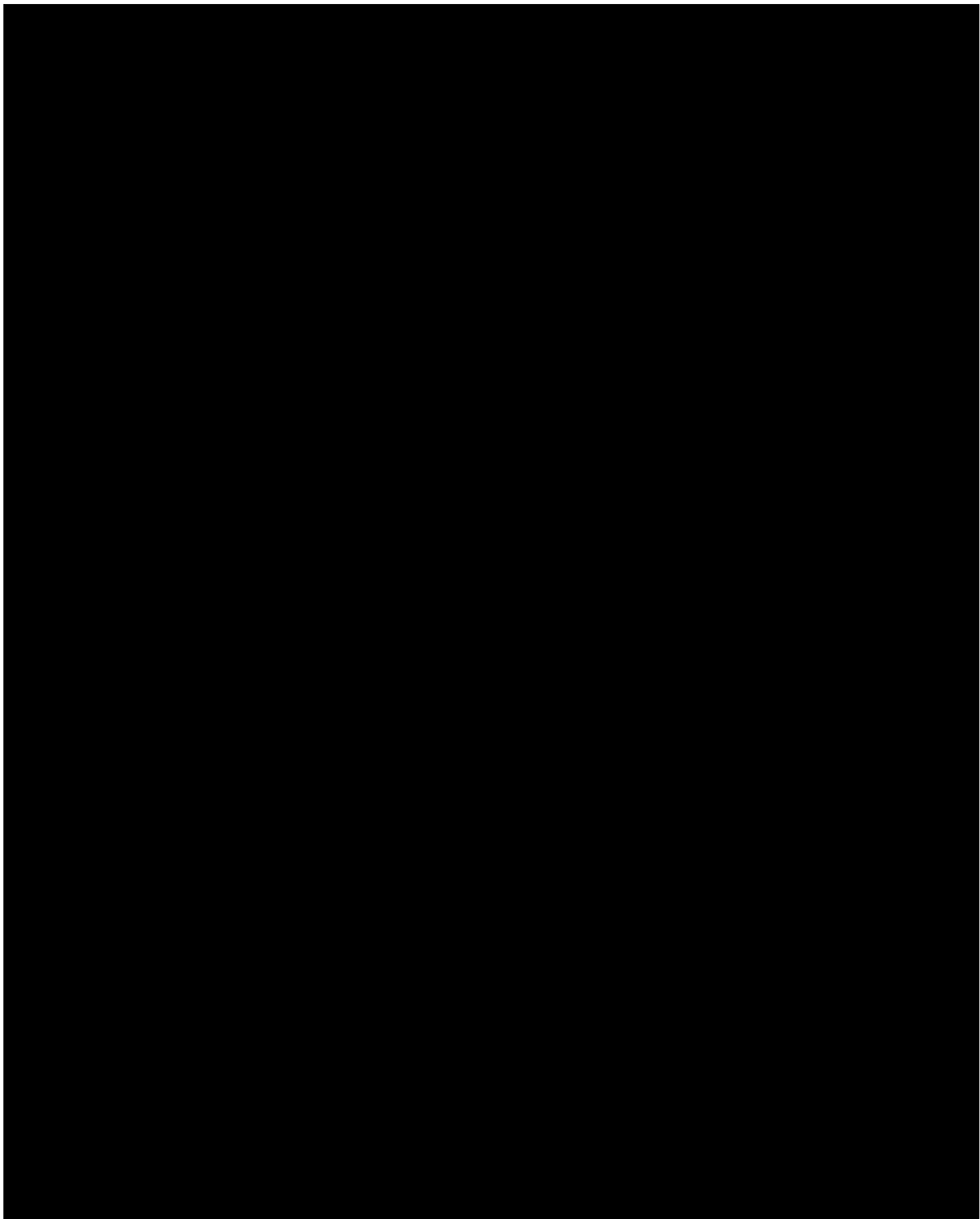
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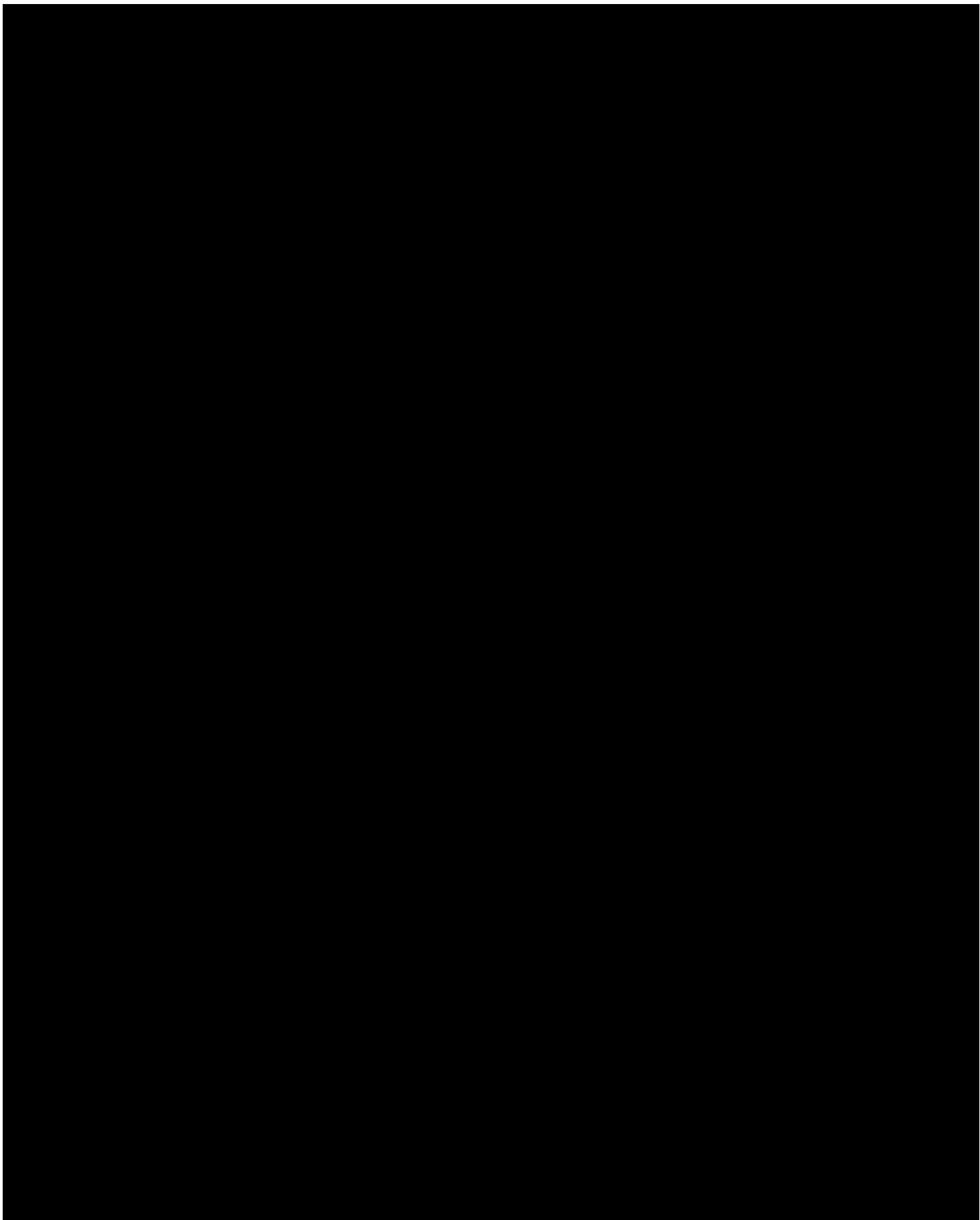
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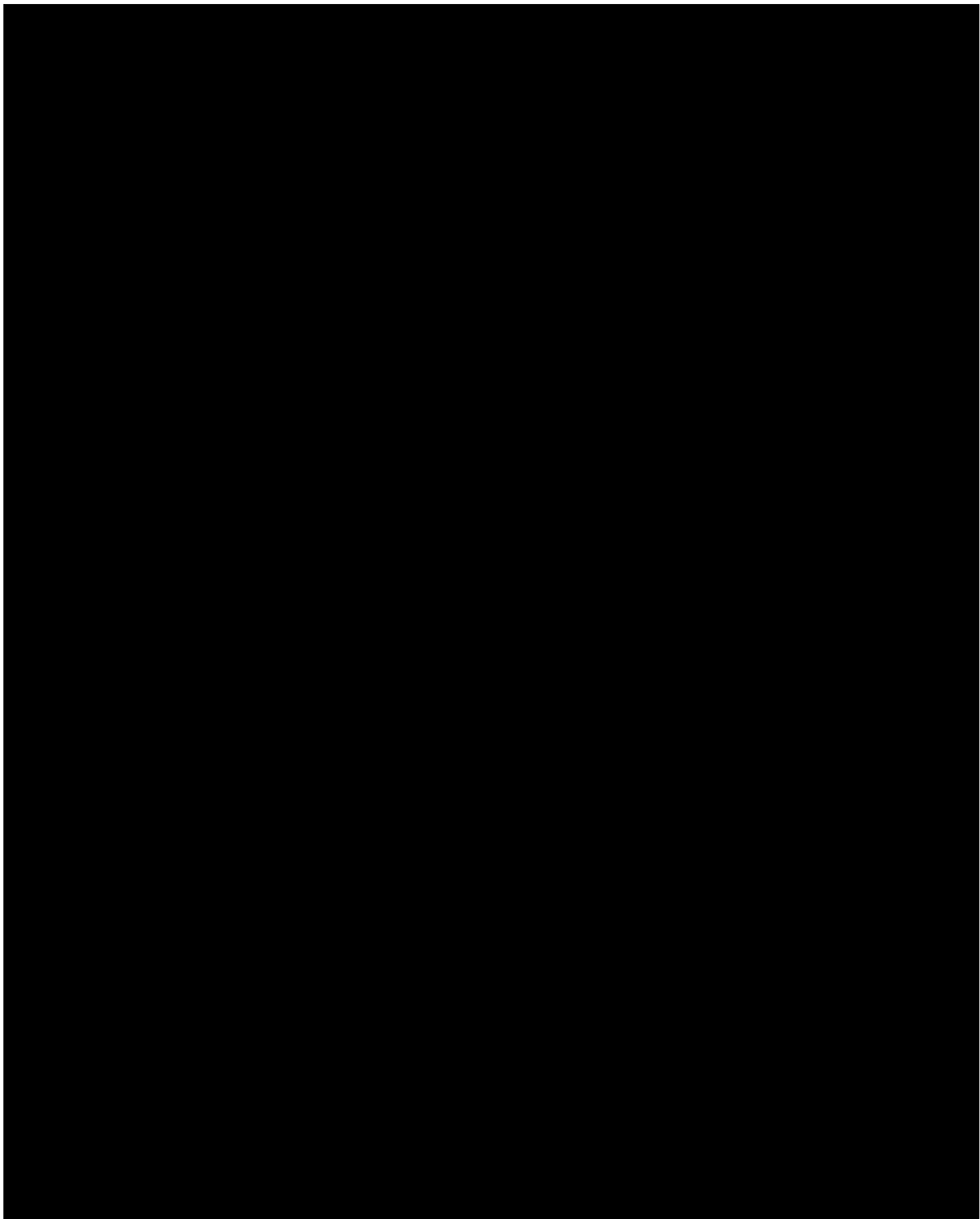
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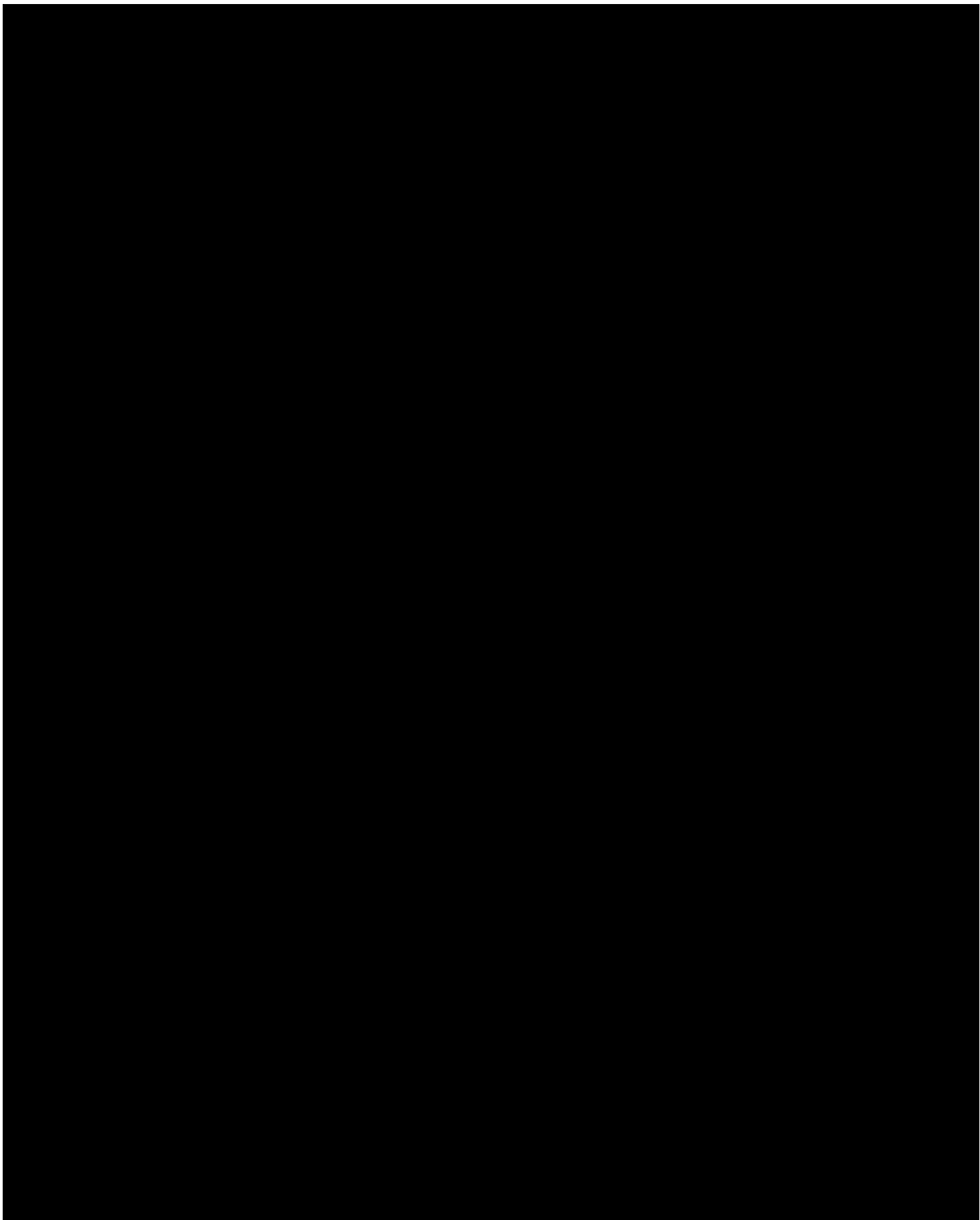
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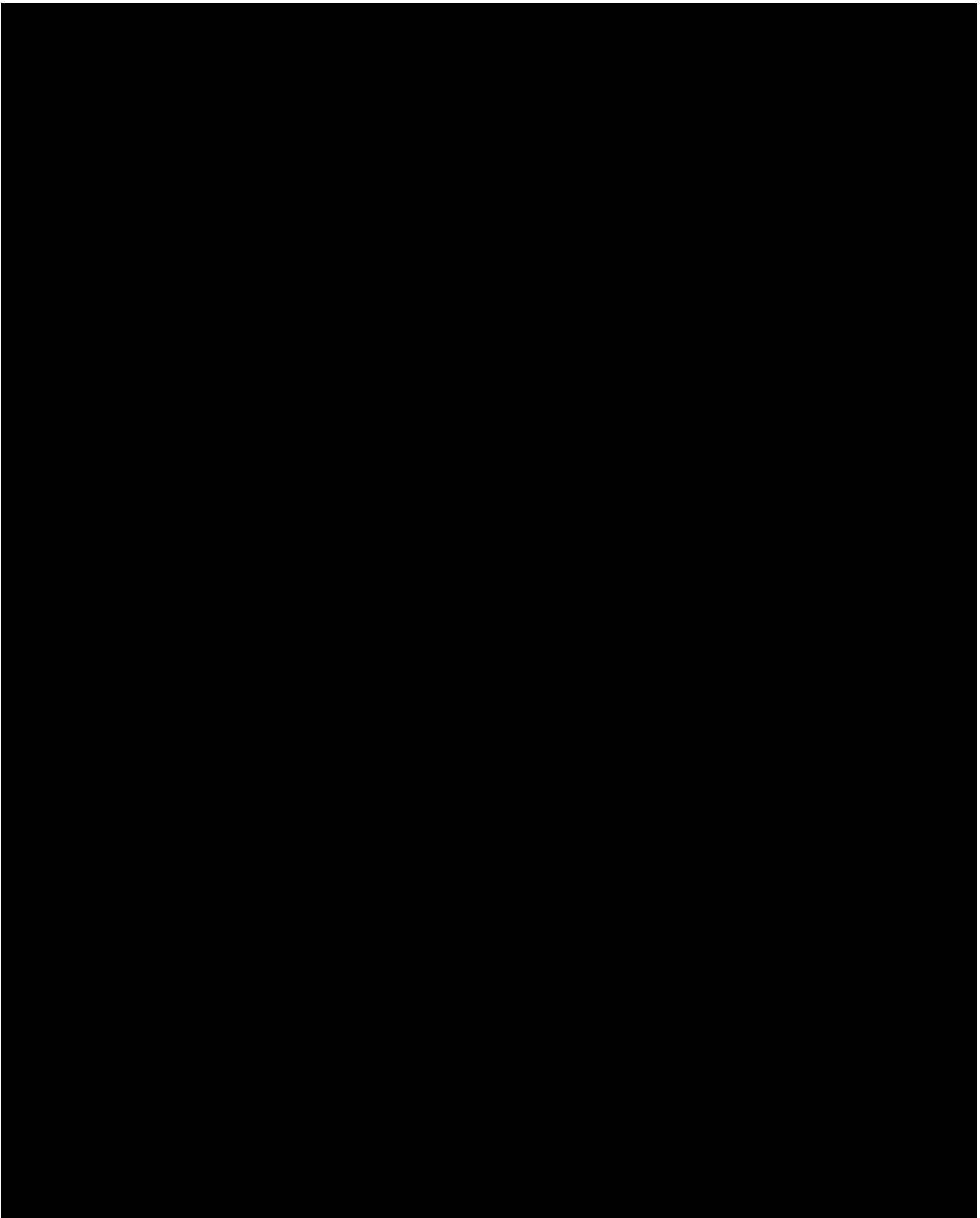


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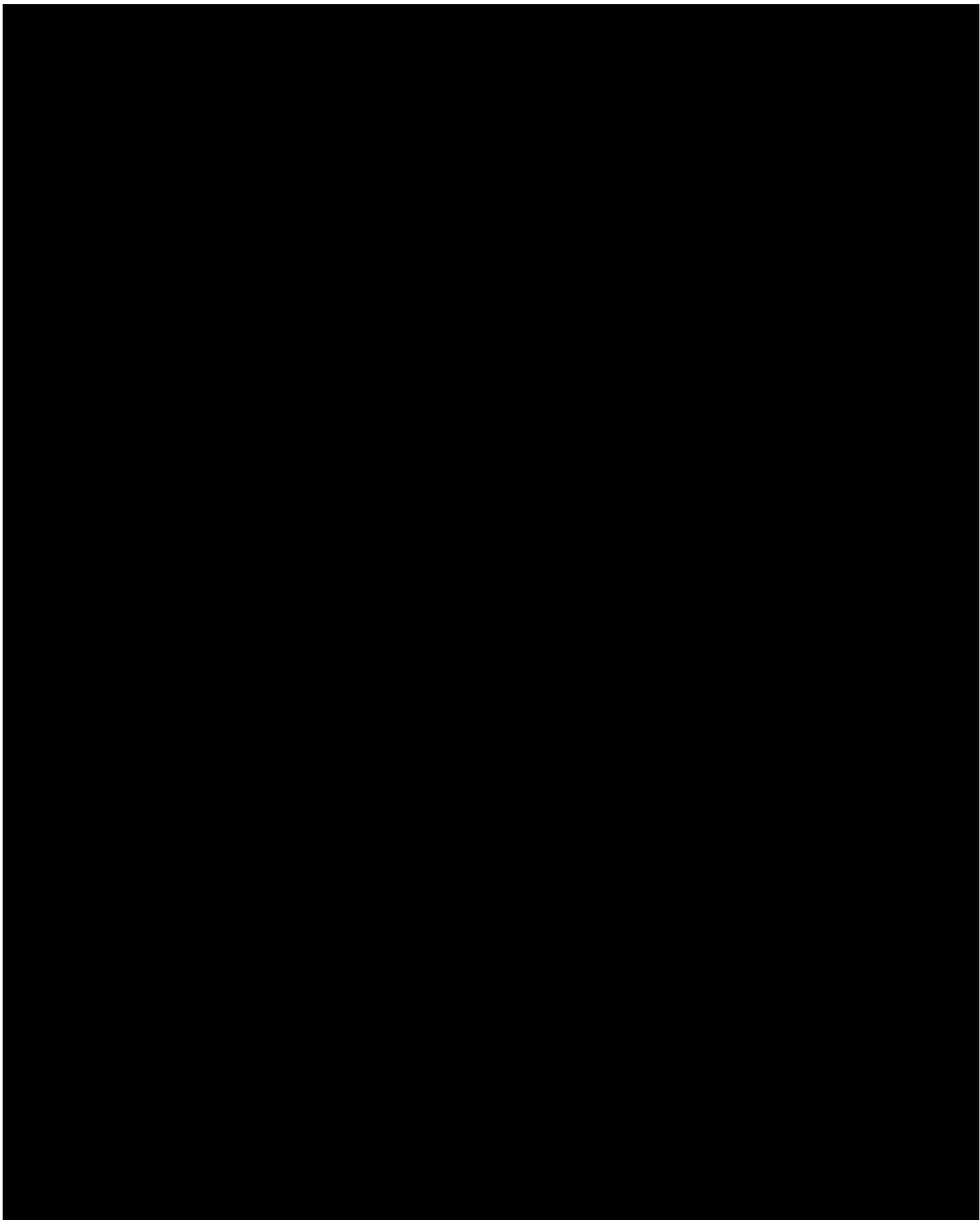




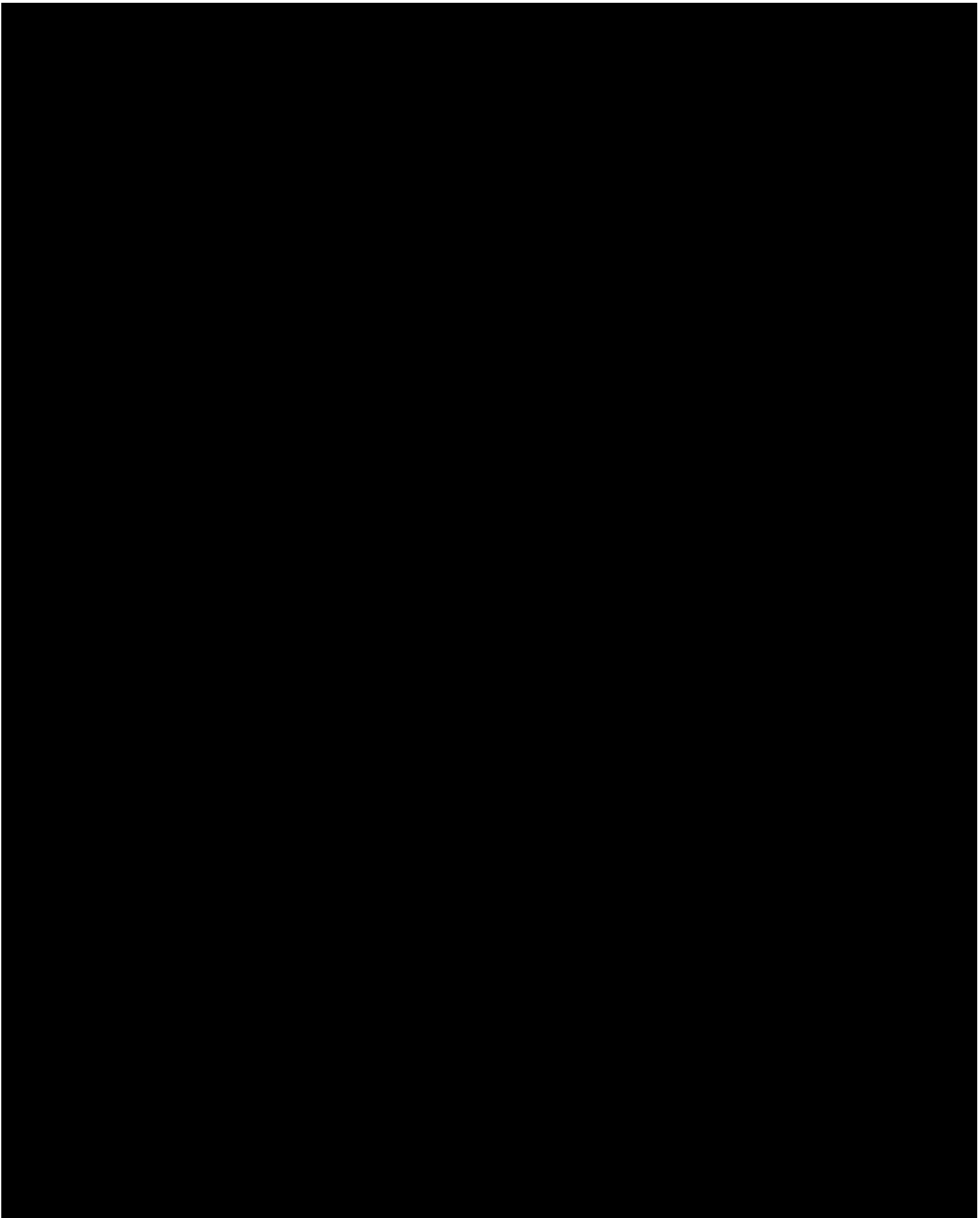
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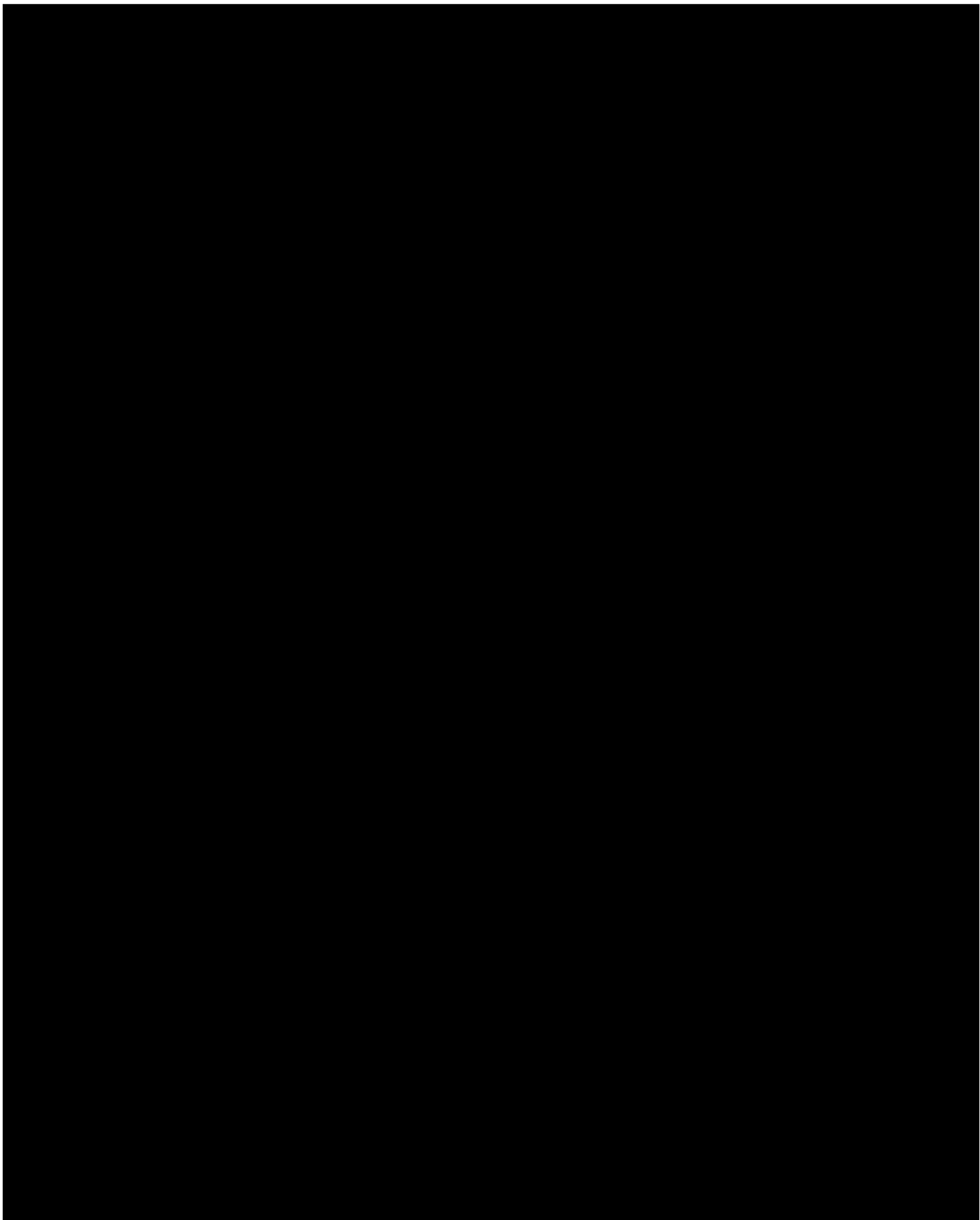
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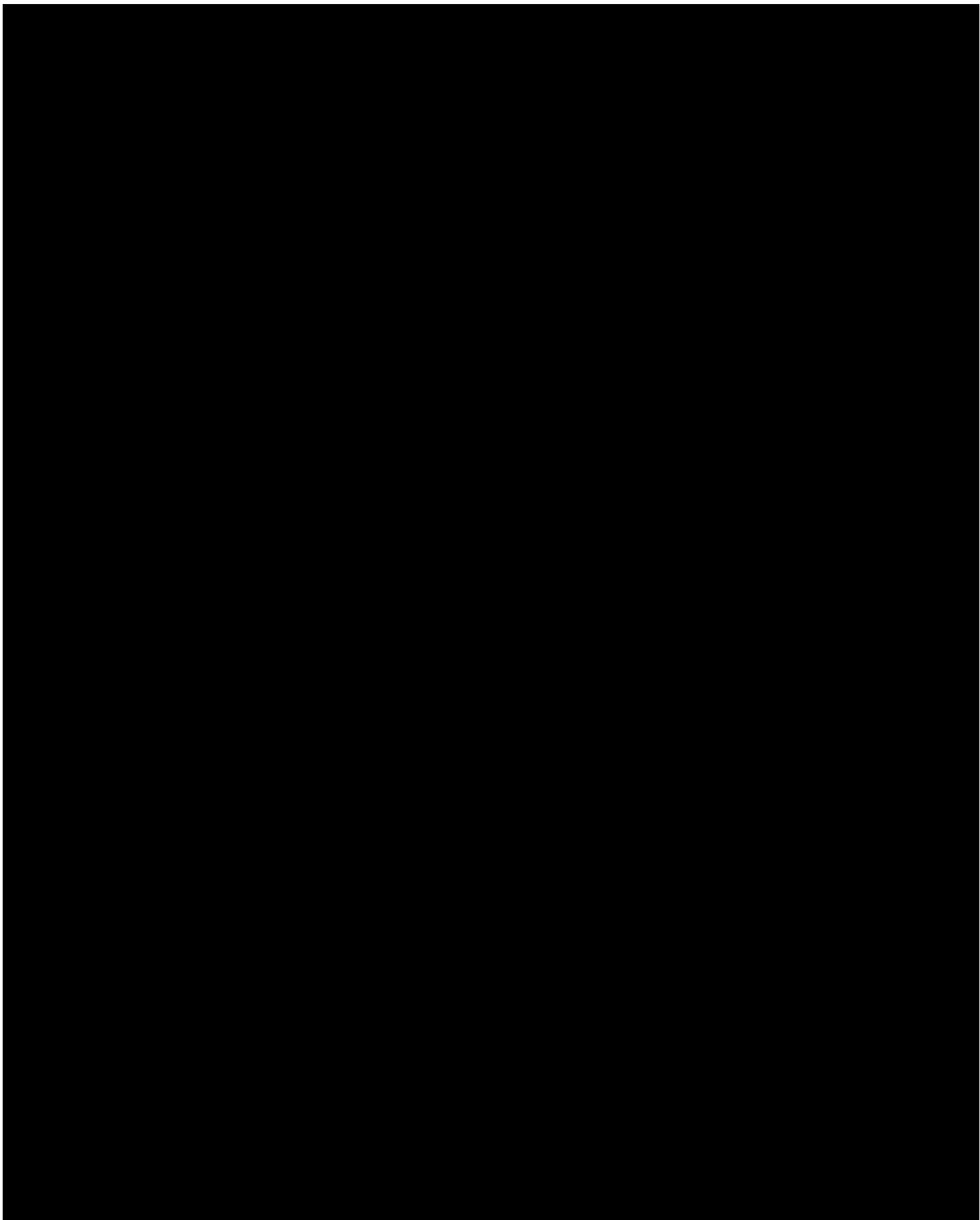
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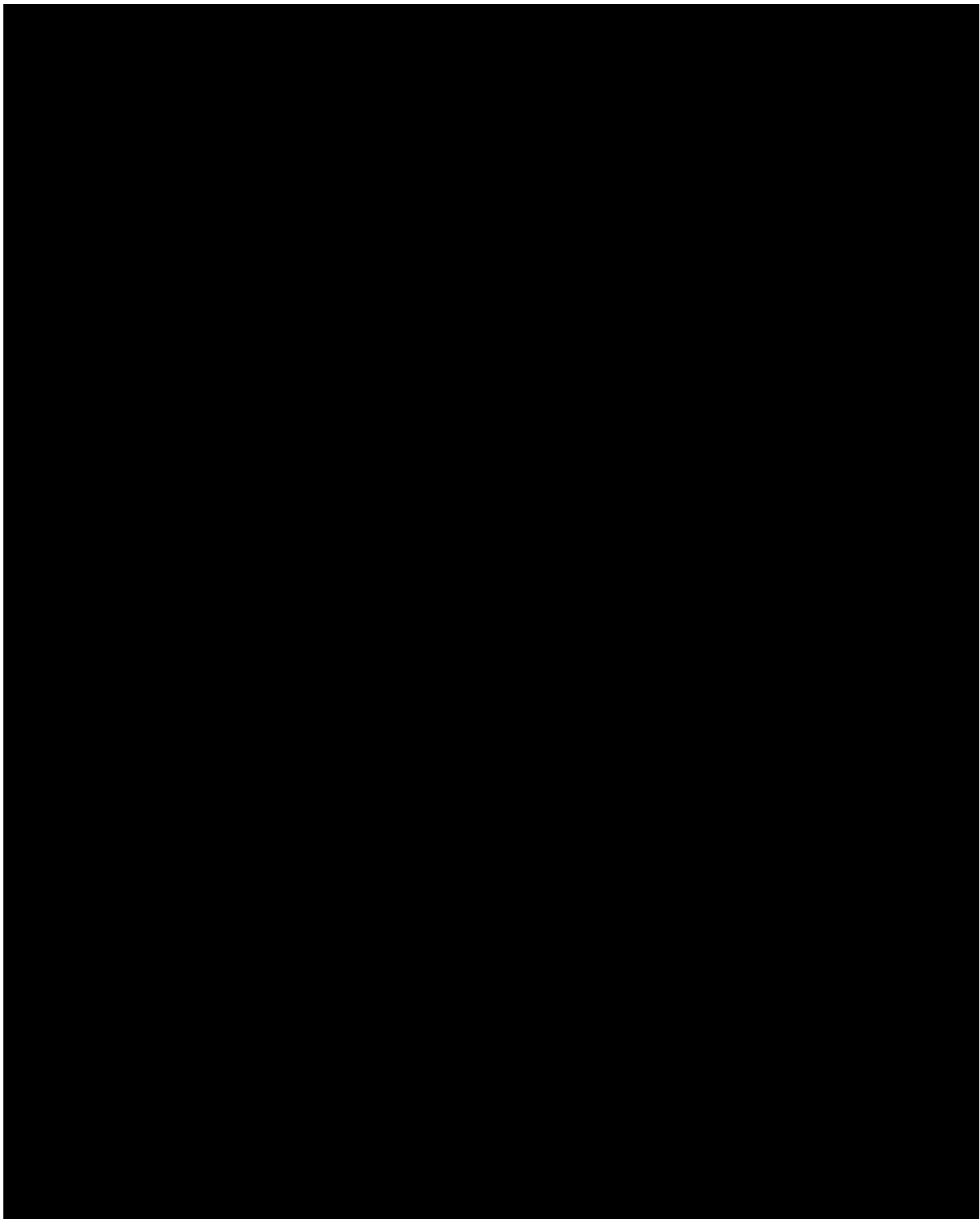
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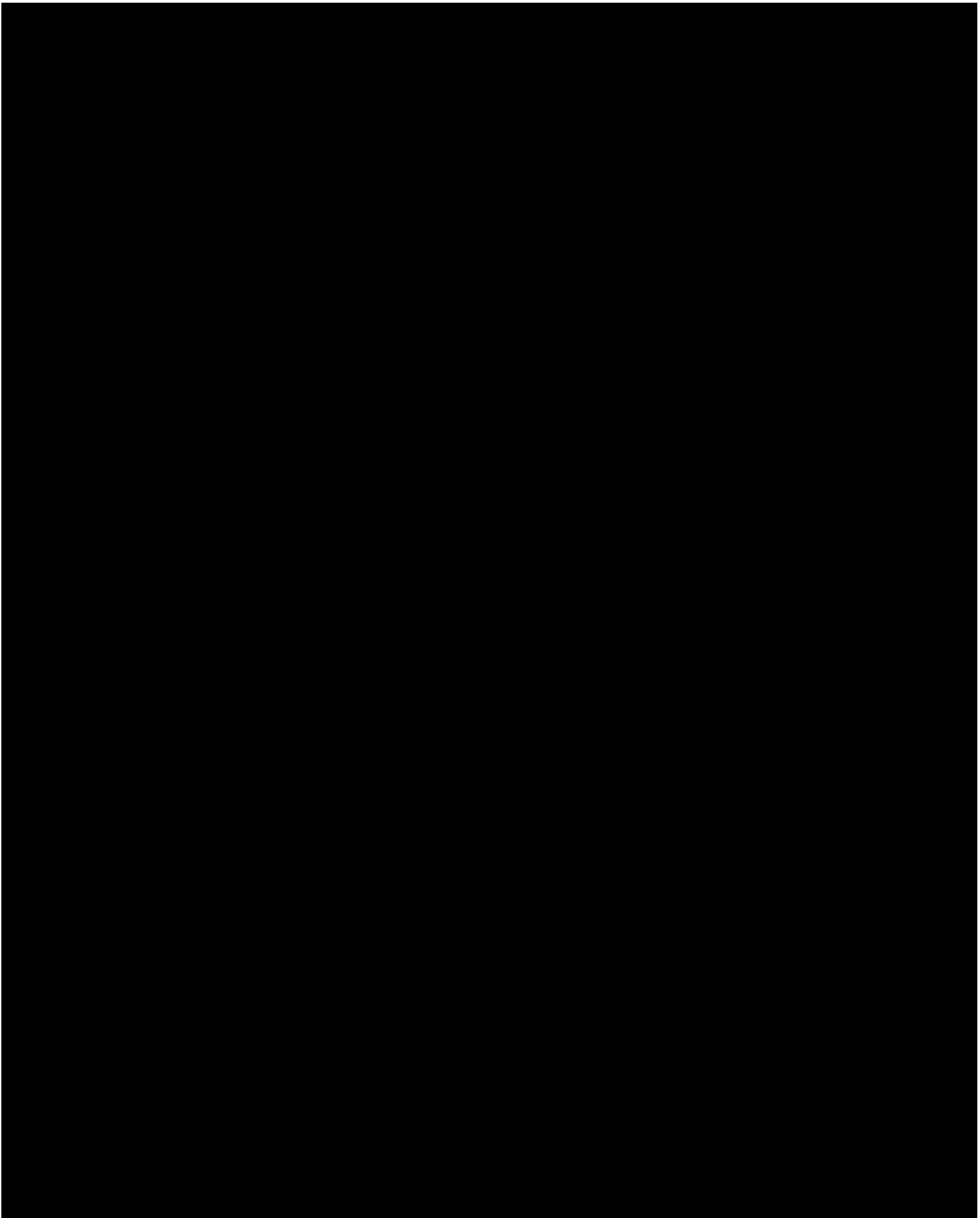
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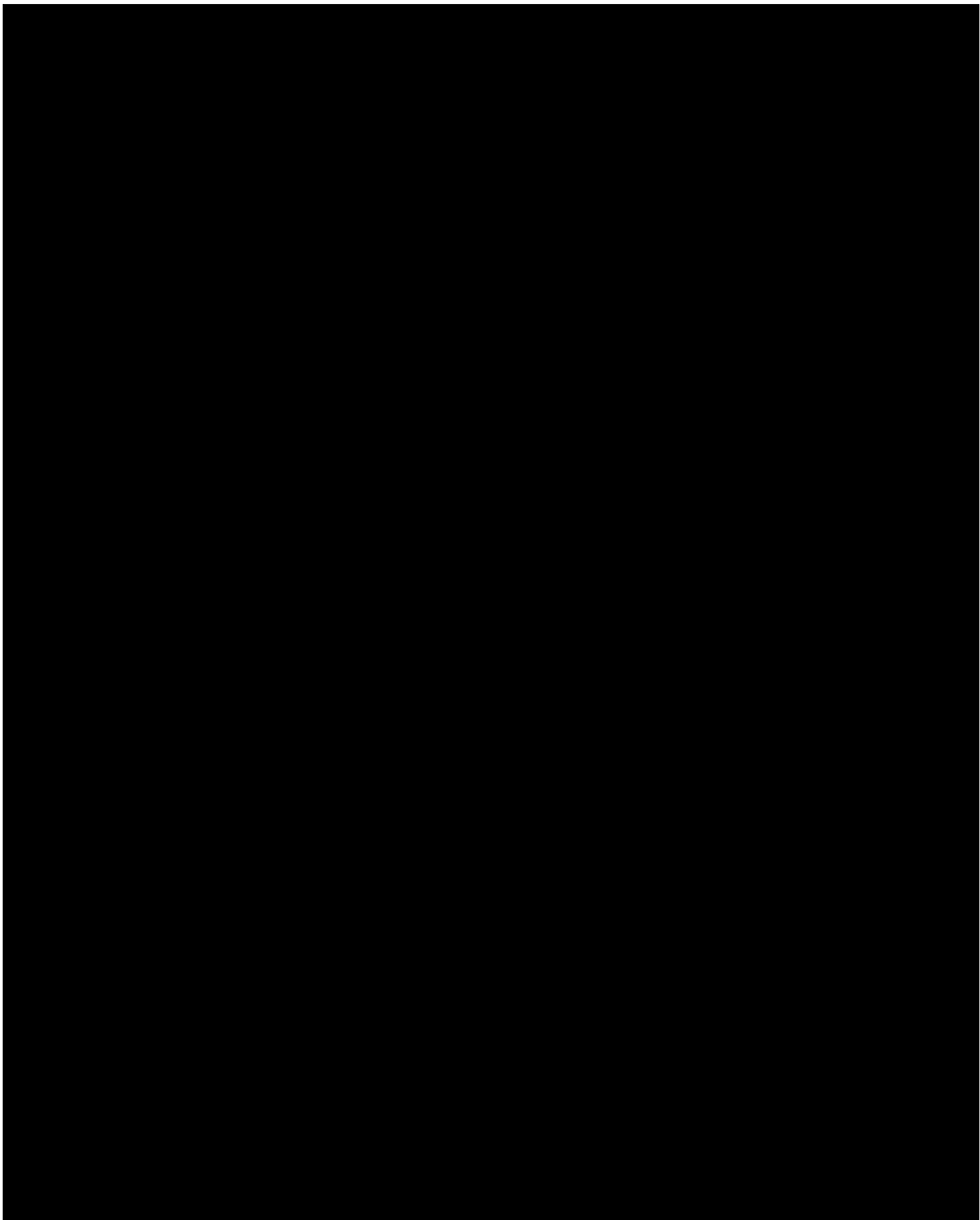
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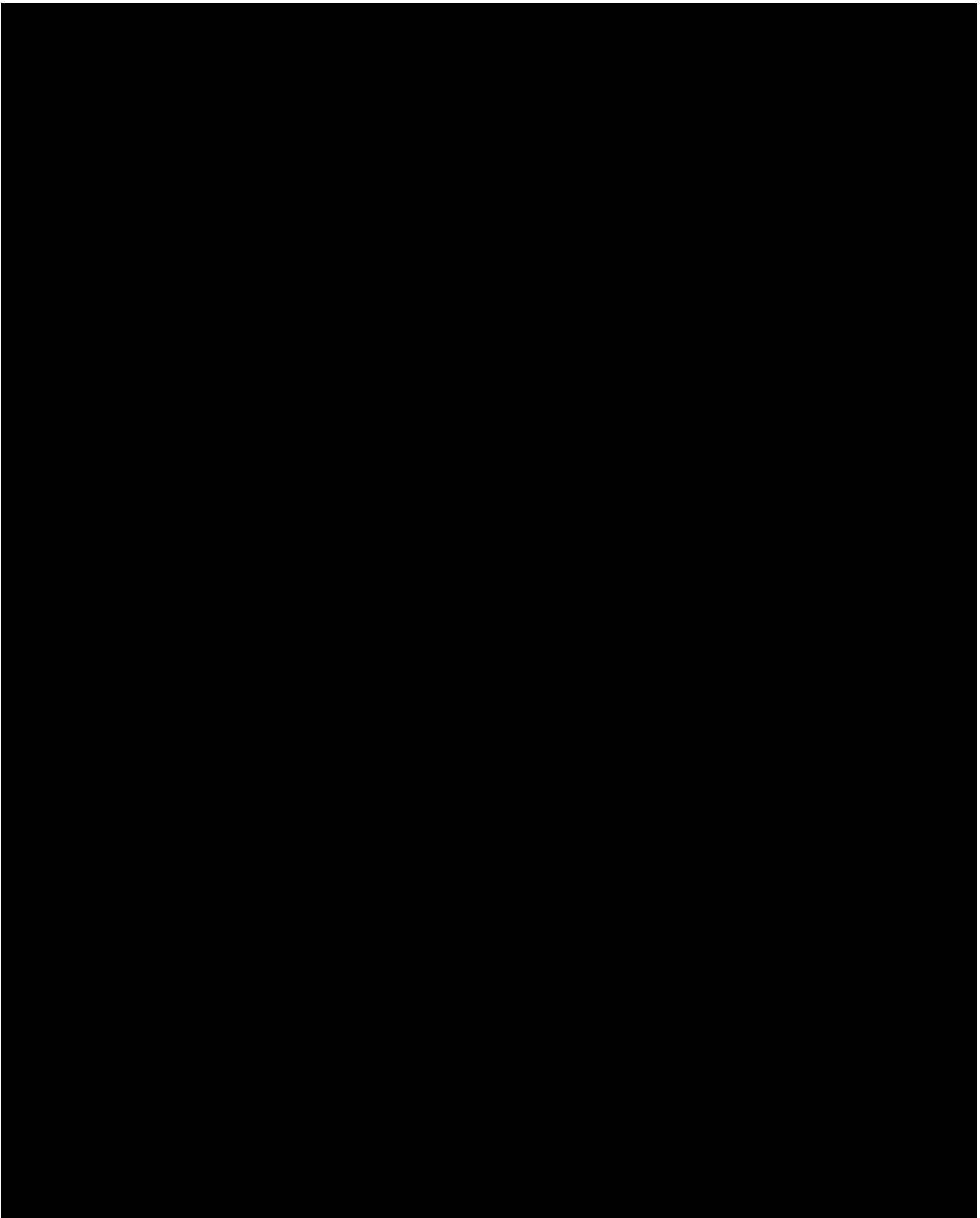


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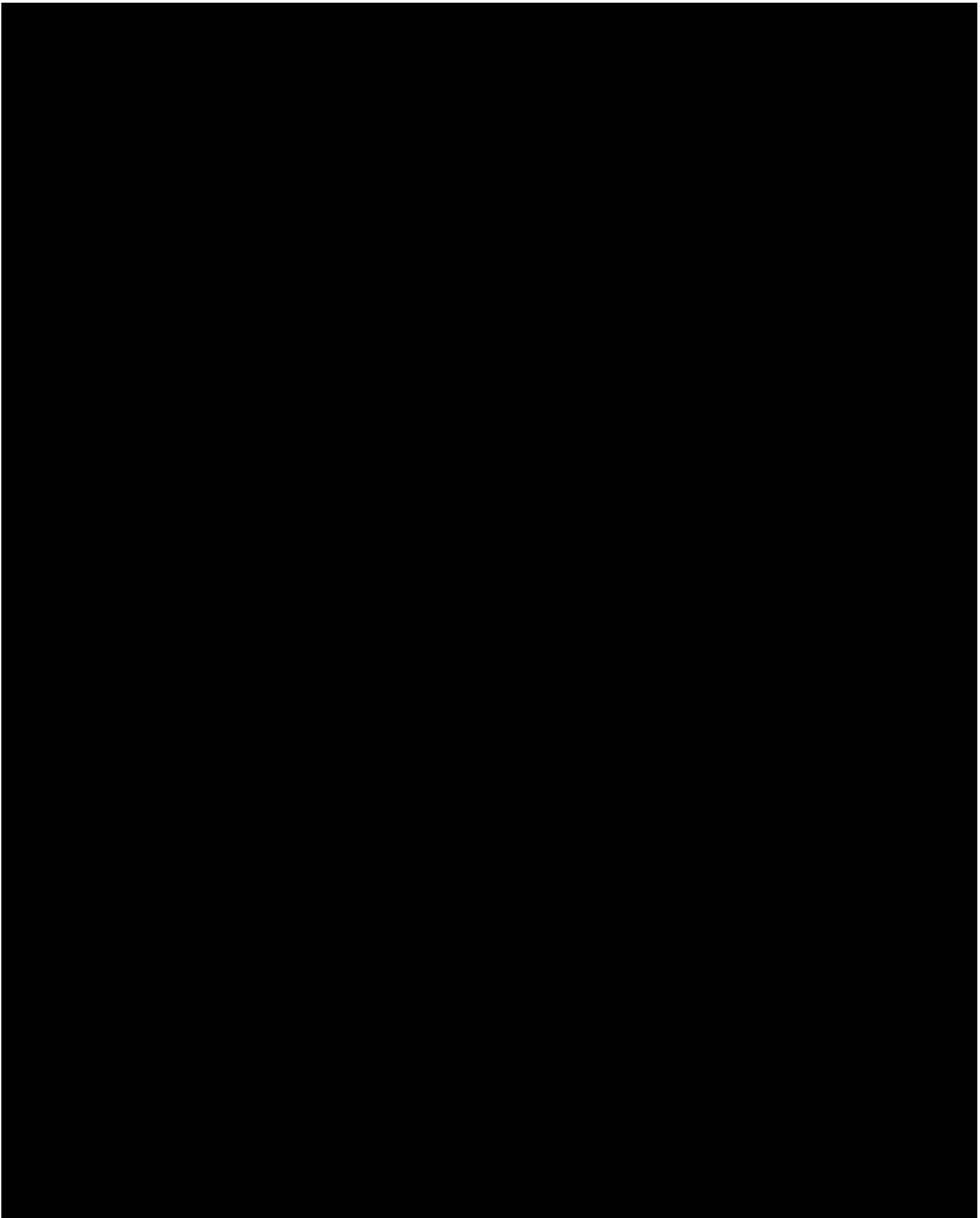




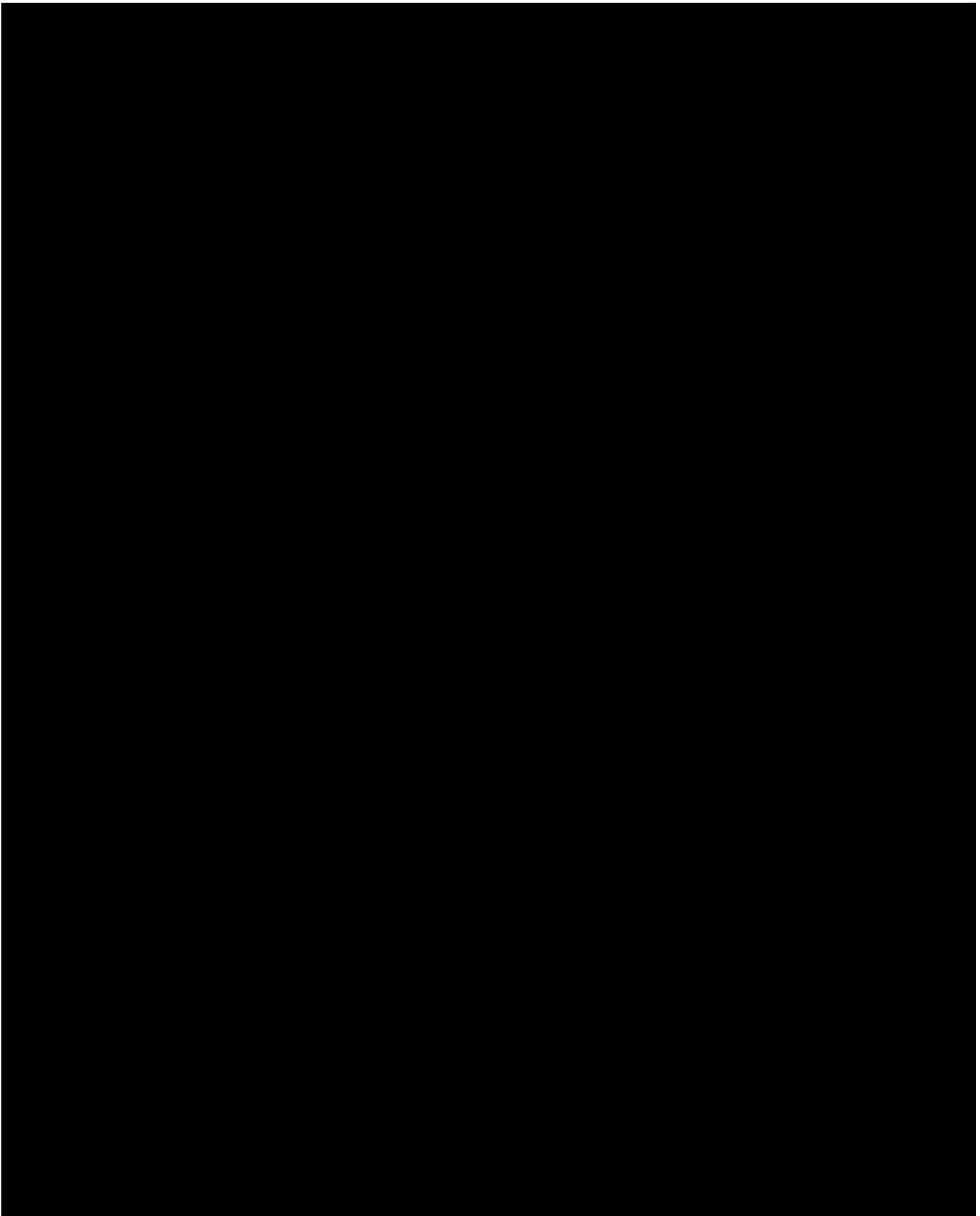
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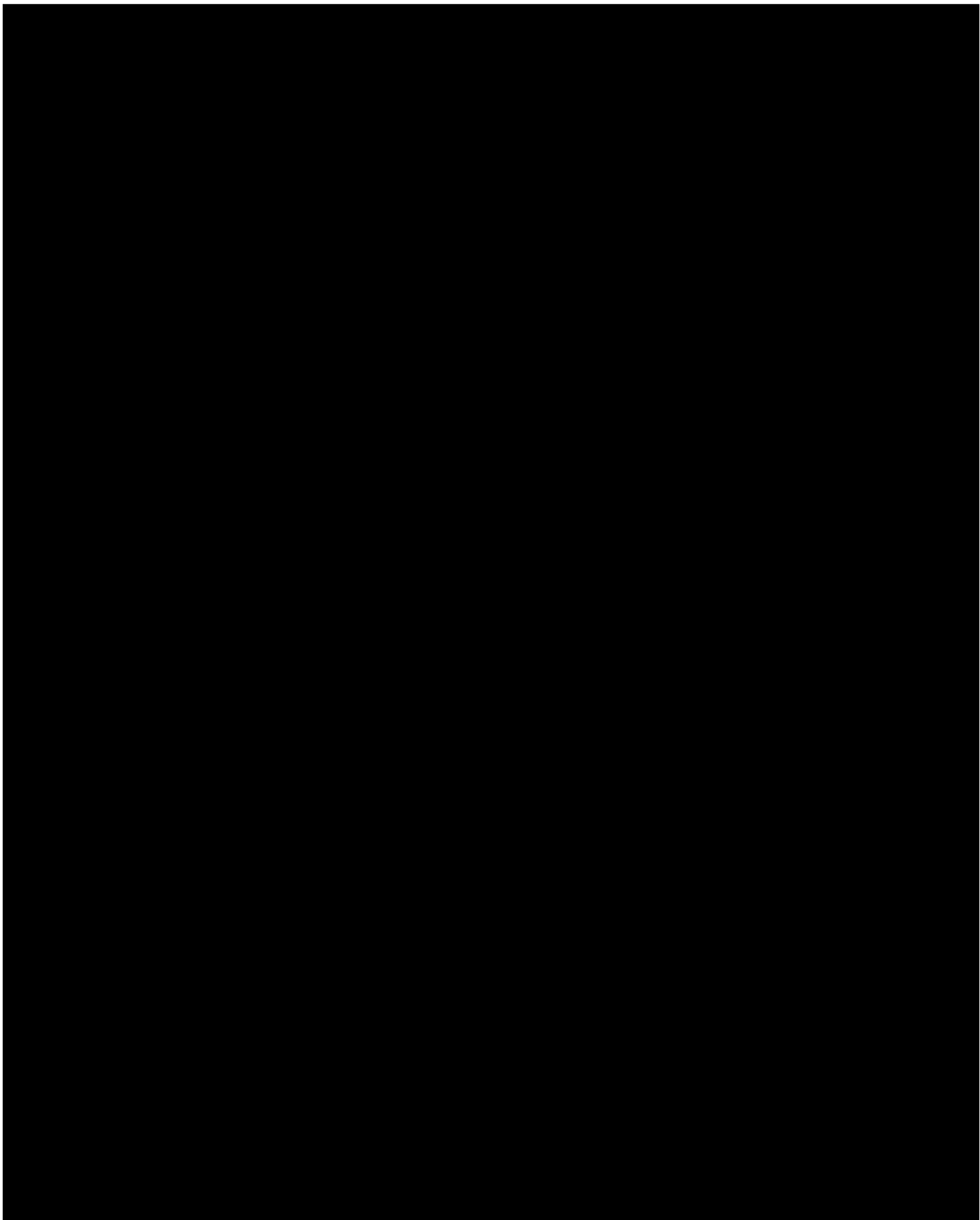
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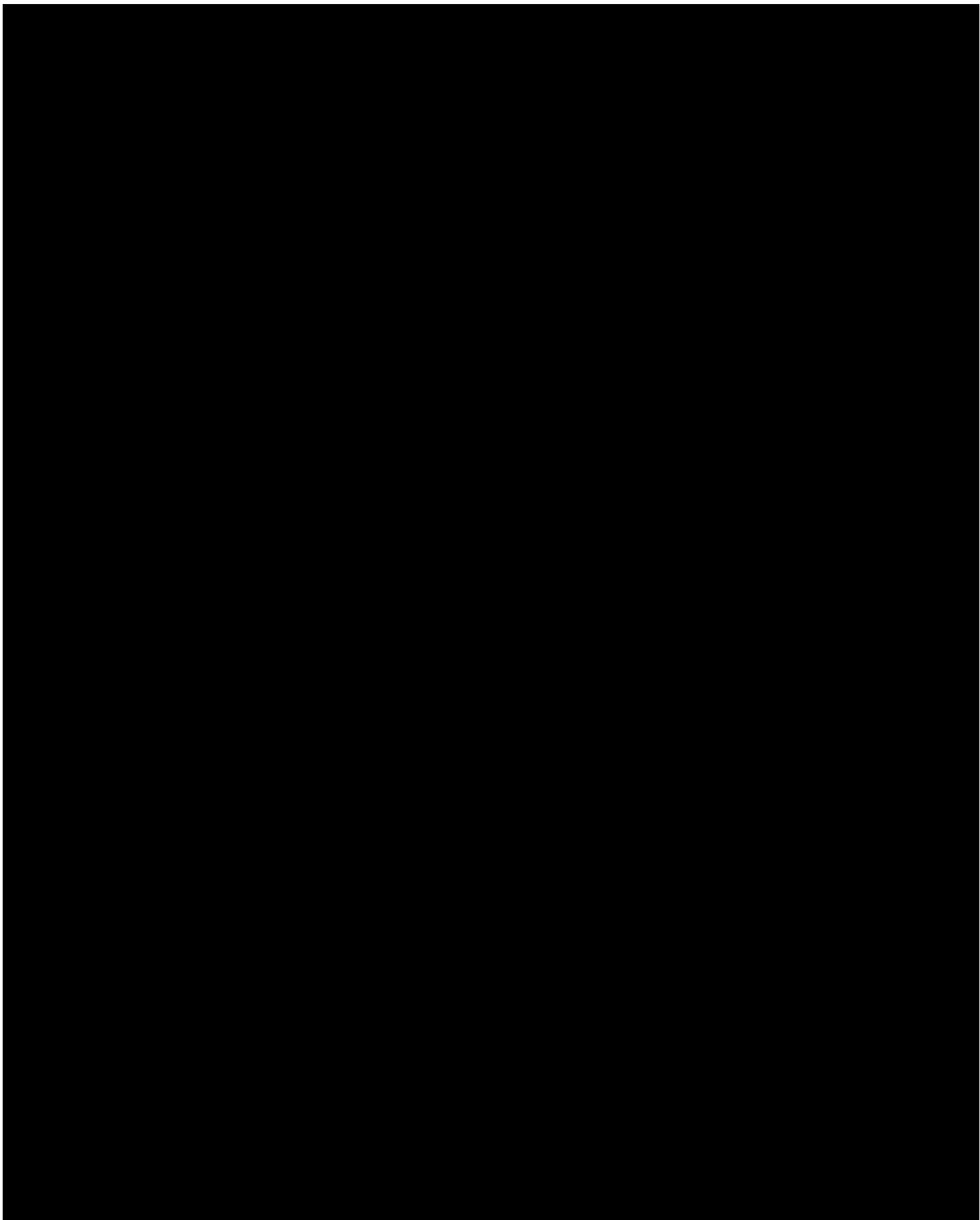
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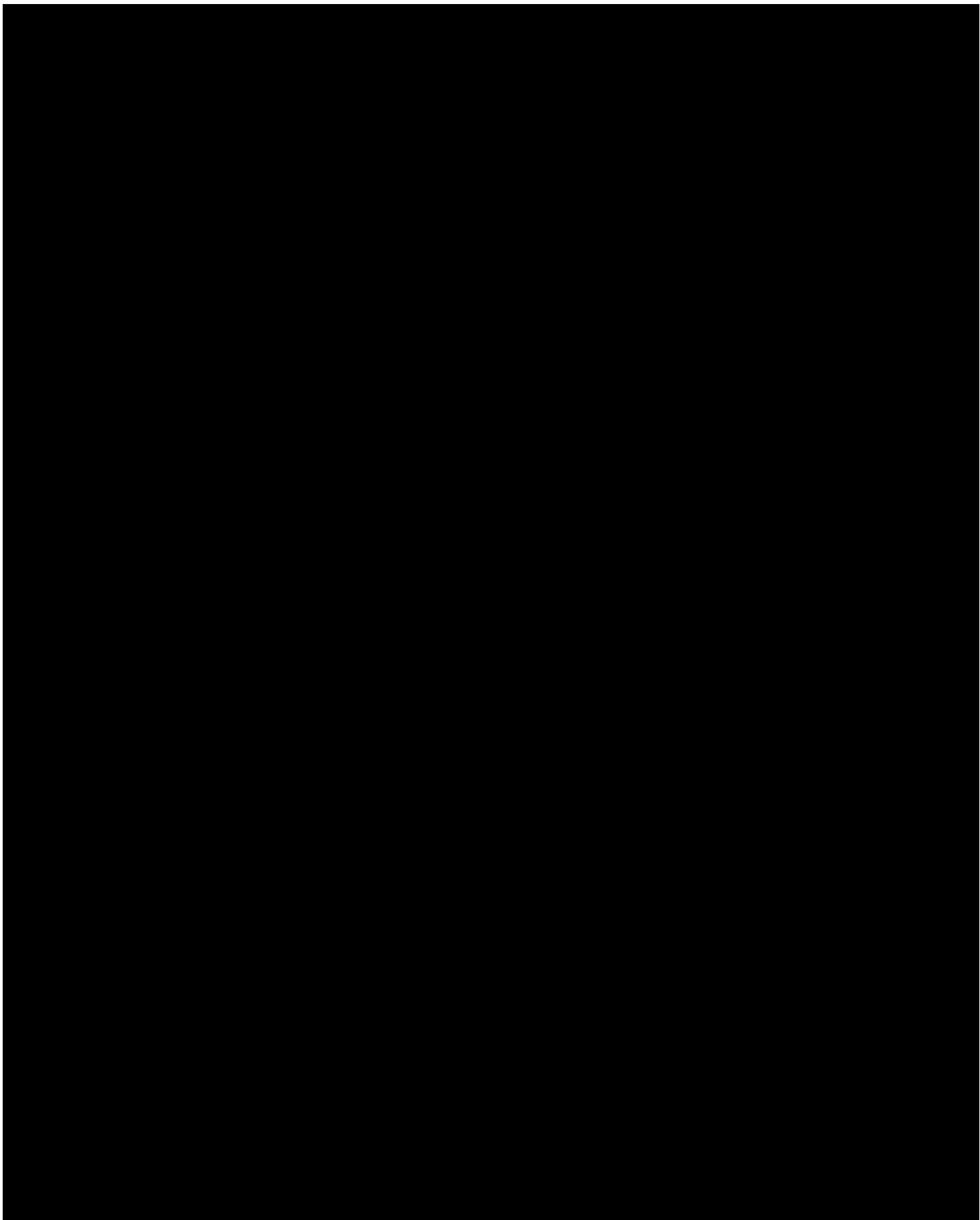
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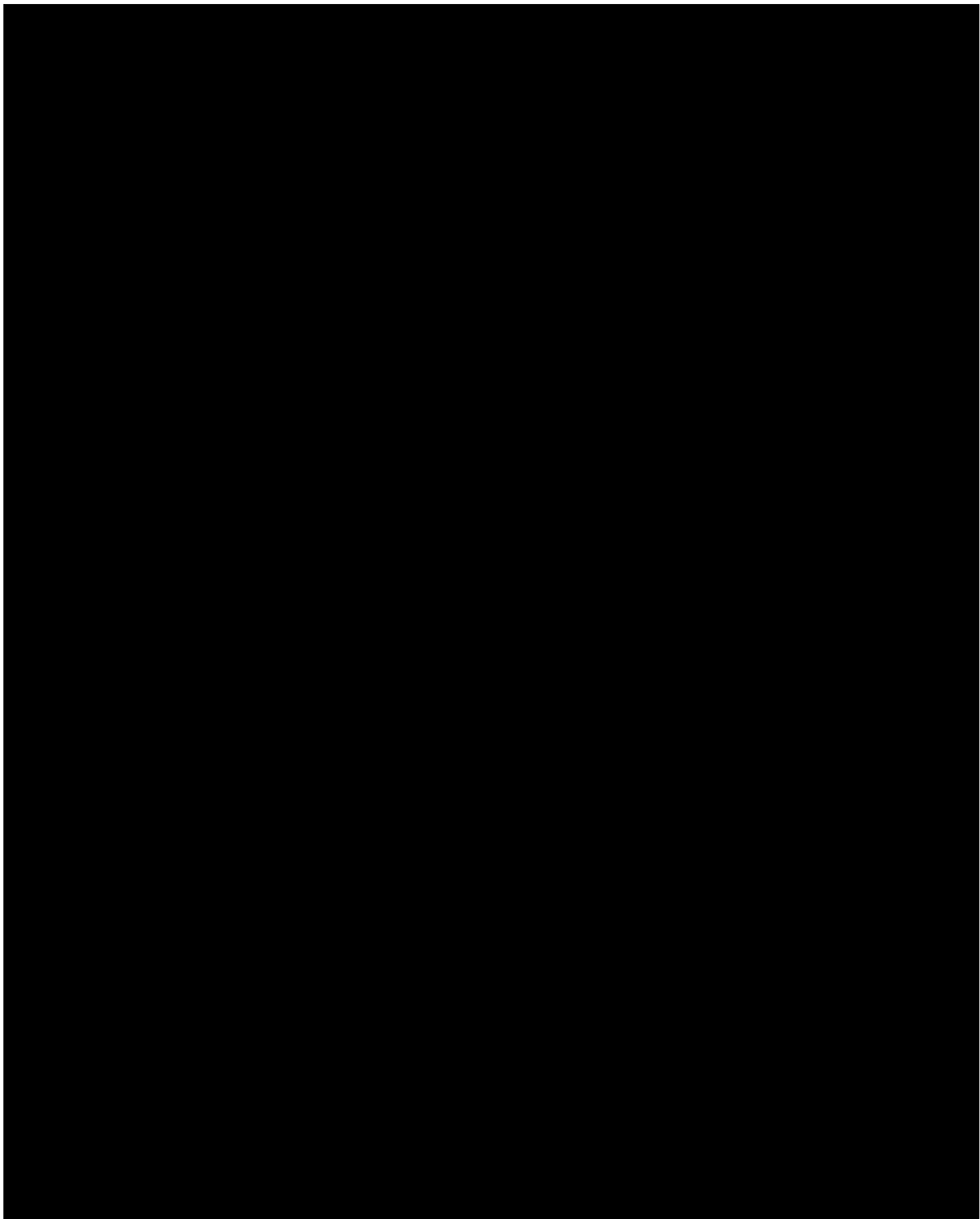
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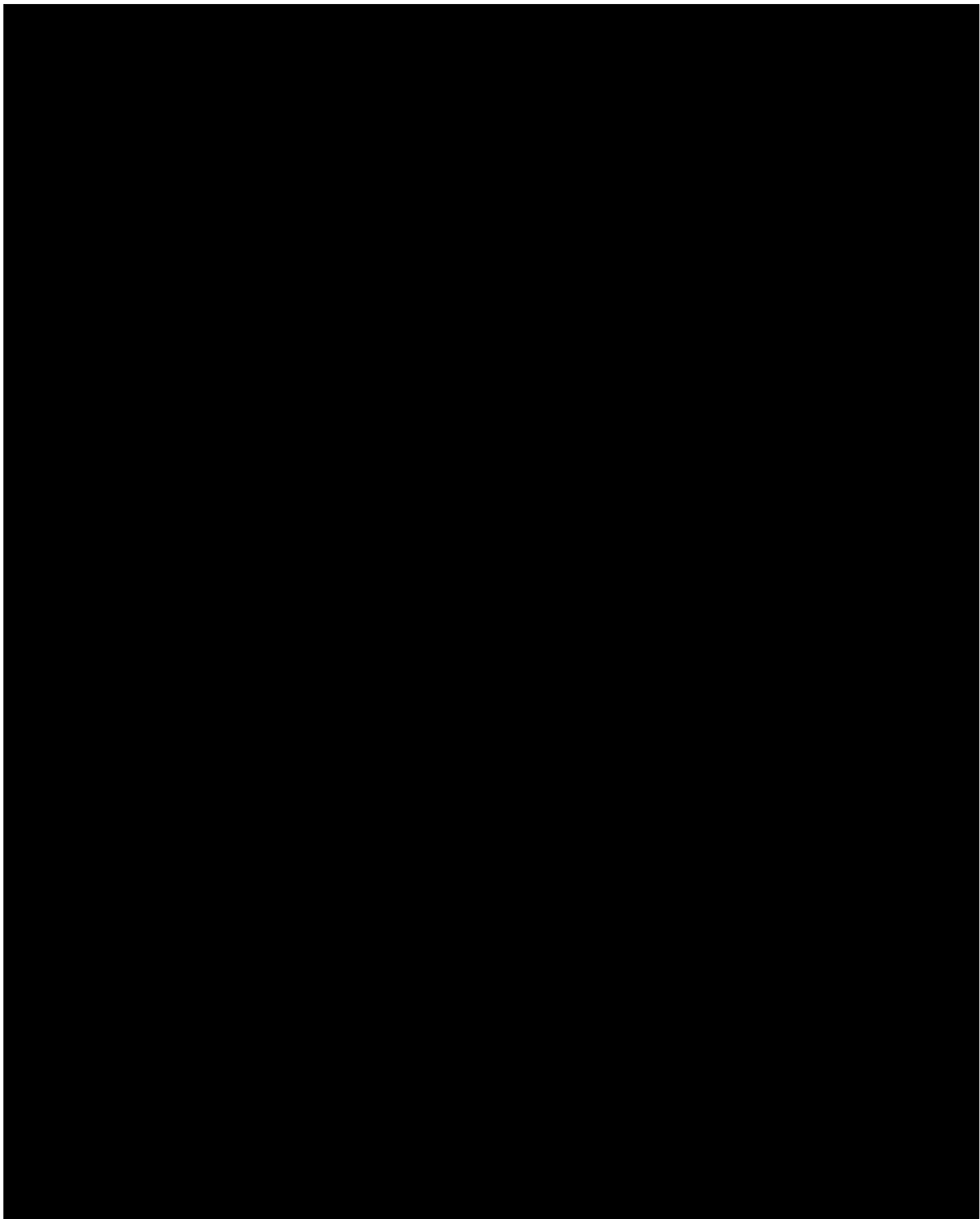
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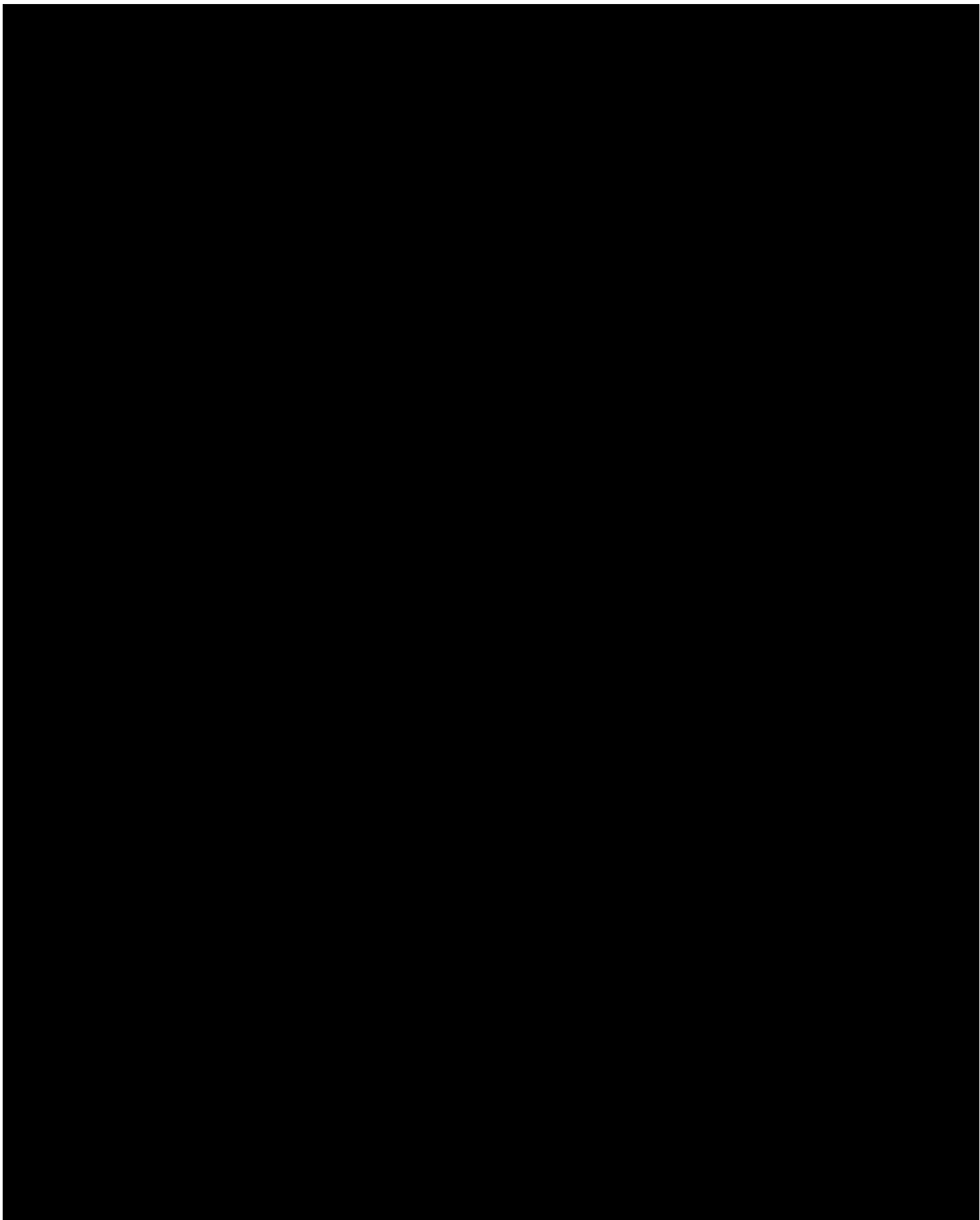


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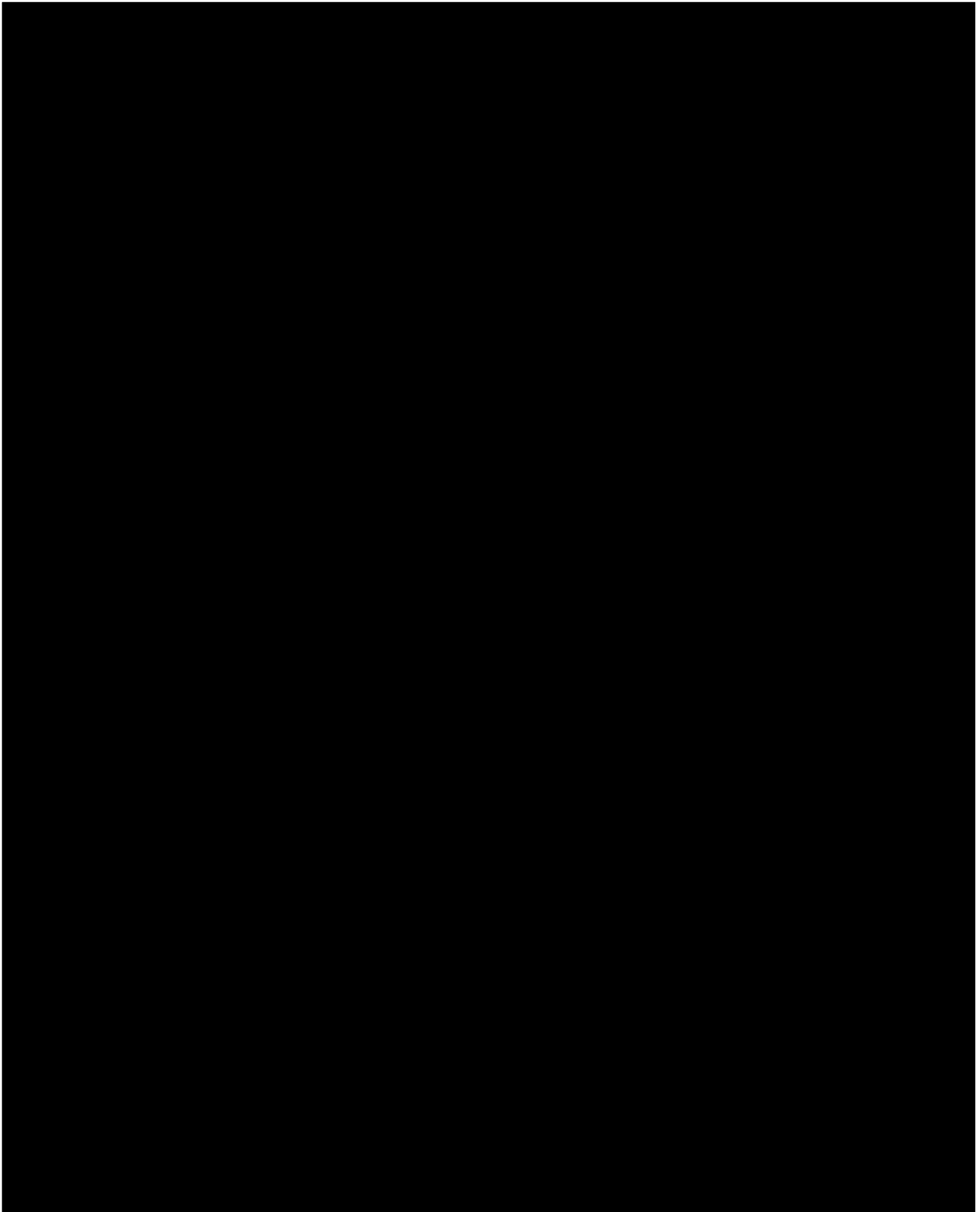




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# **EXHIBIT 35**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE  
CENTRE GMBH and WEST PUBLISHING  
CORPORATION,

Plaintiffs/Counterdefendants

v.

ROSS INTELLIGENCE INC.,

Defendant/Counterclaimant

1:20-cv-00613-SB

**REBUTTAL EXPERT REPORT OF CHAD SYVERSON, PH.D.**

**JUNE 22, 2023**

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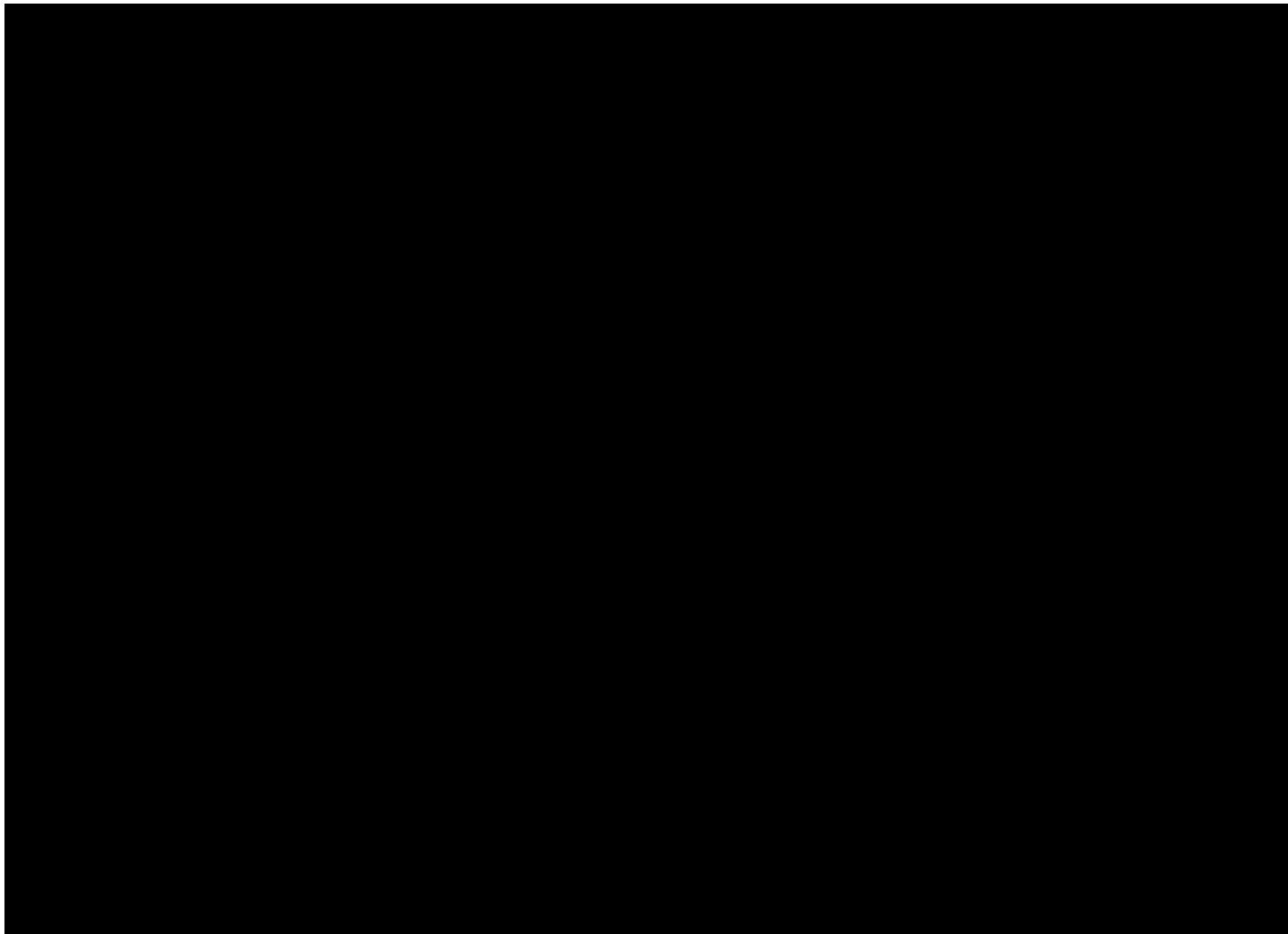
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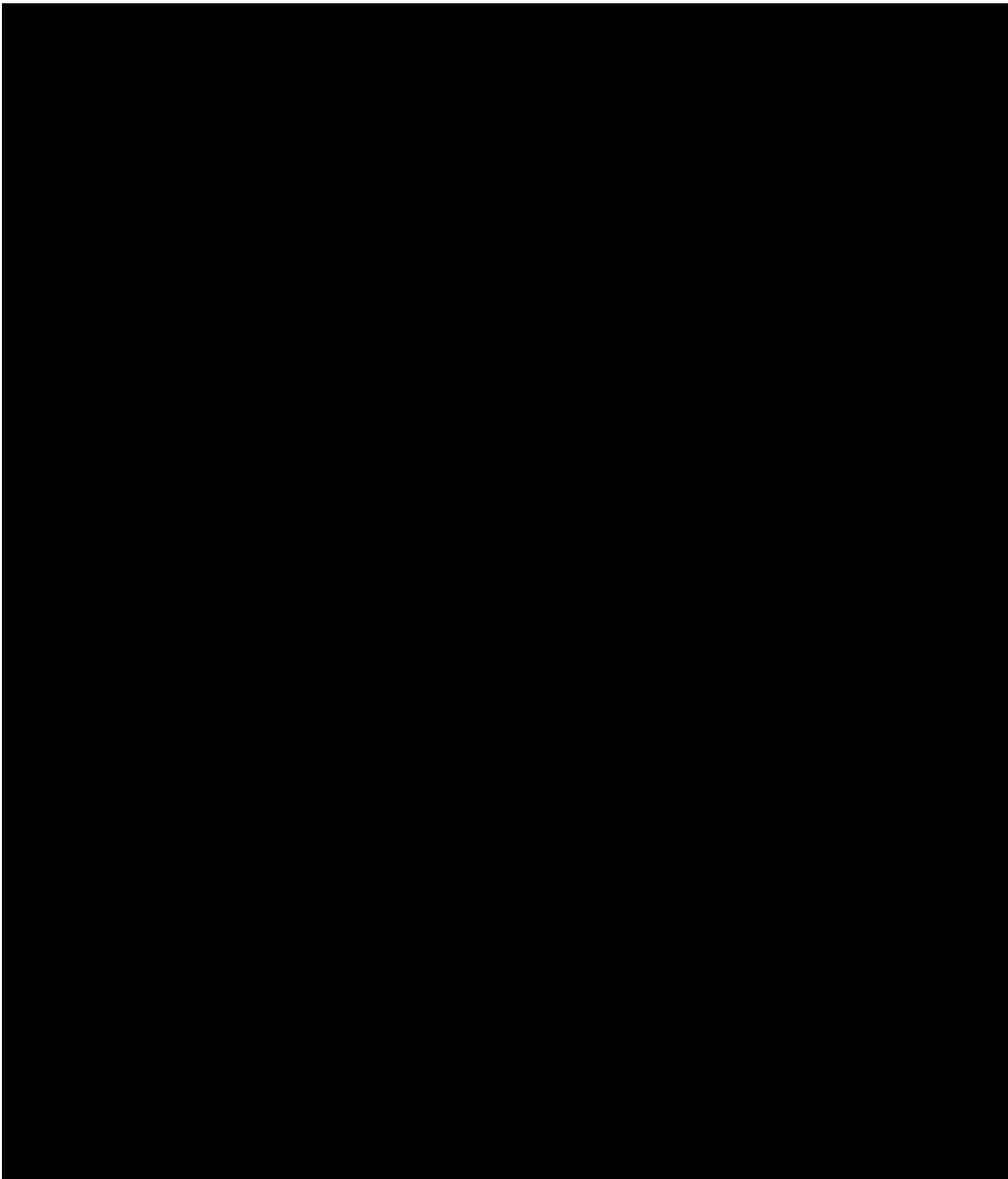
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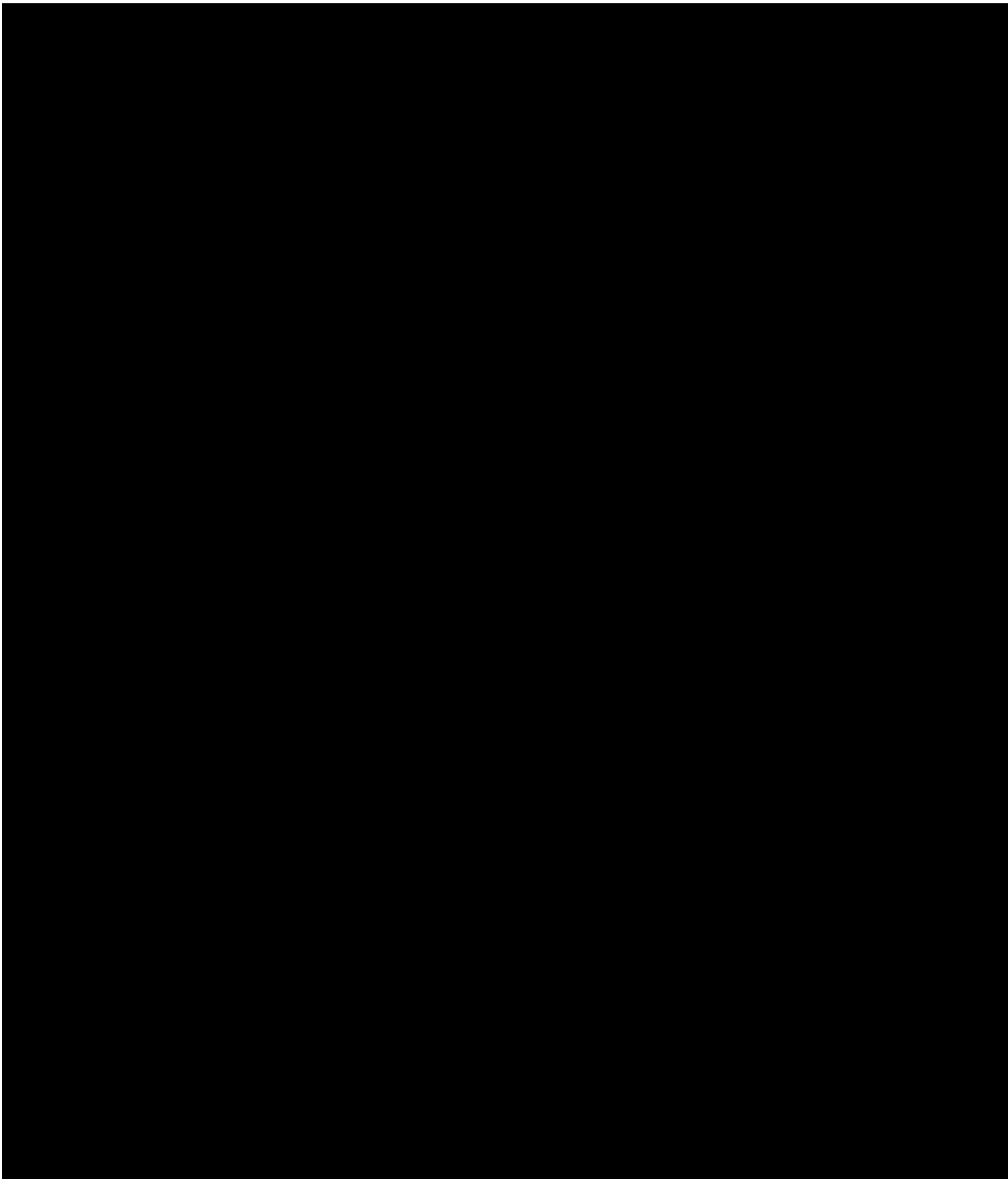
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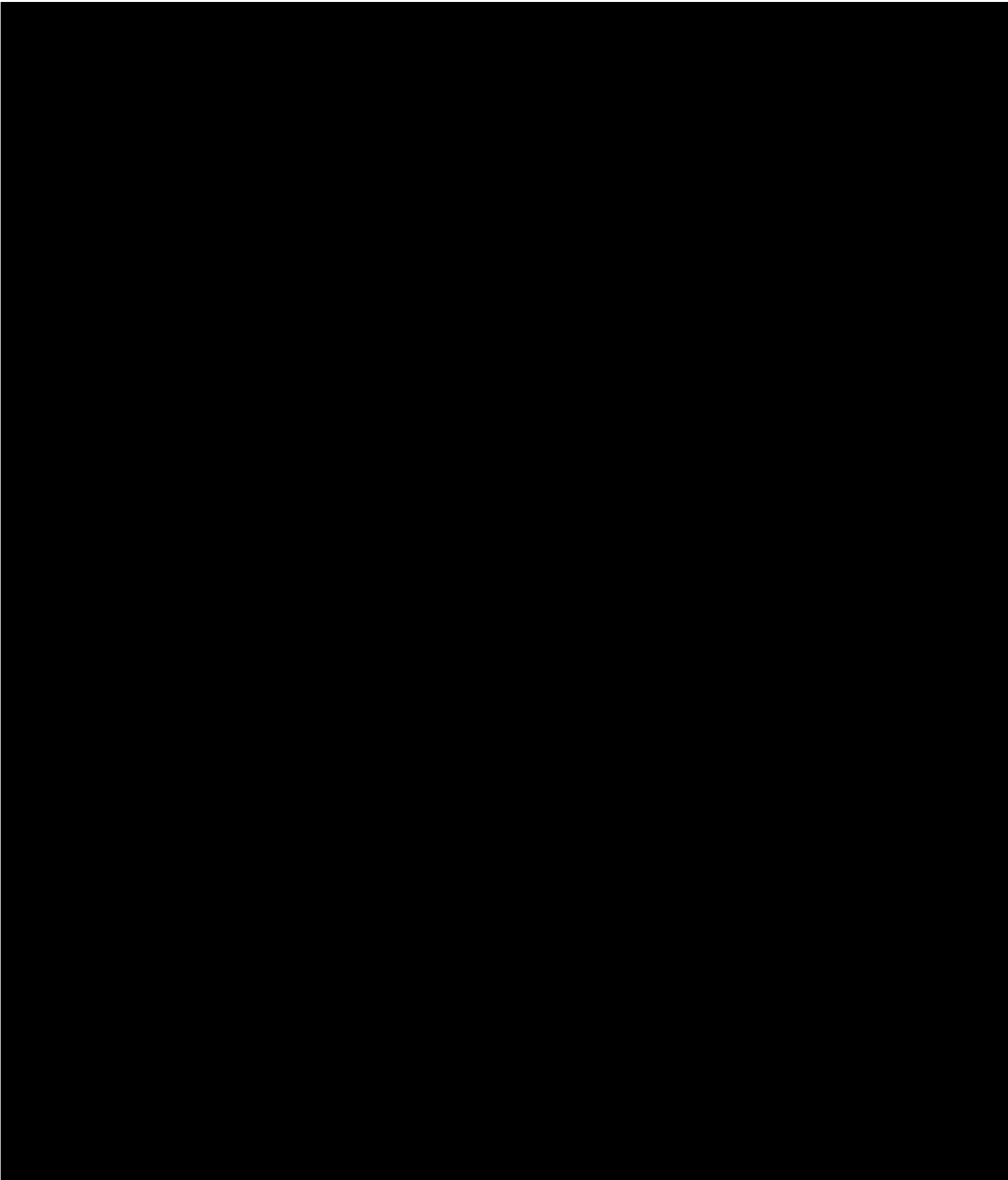
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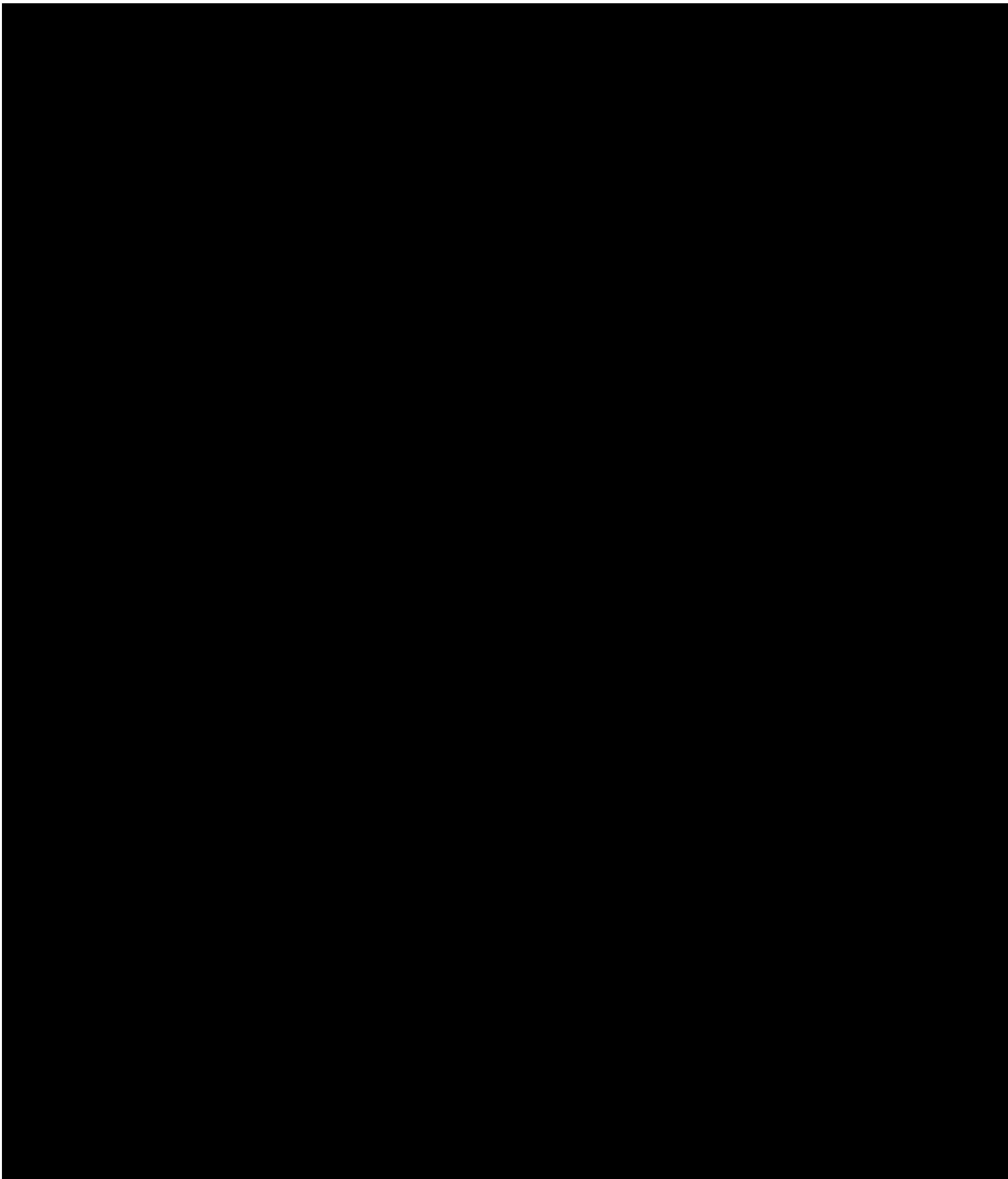


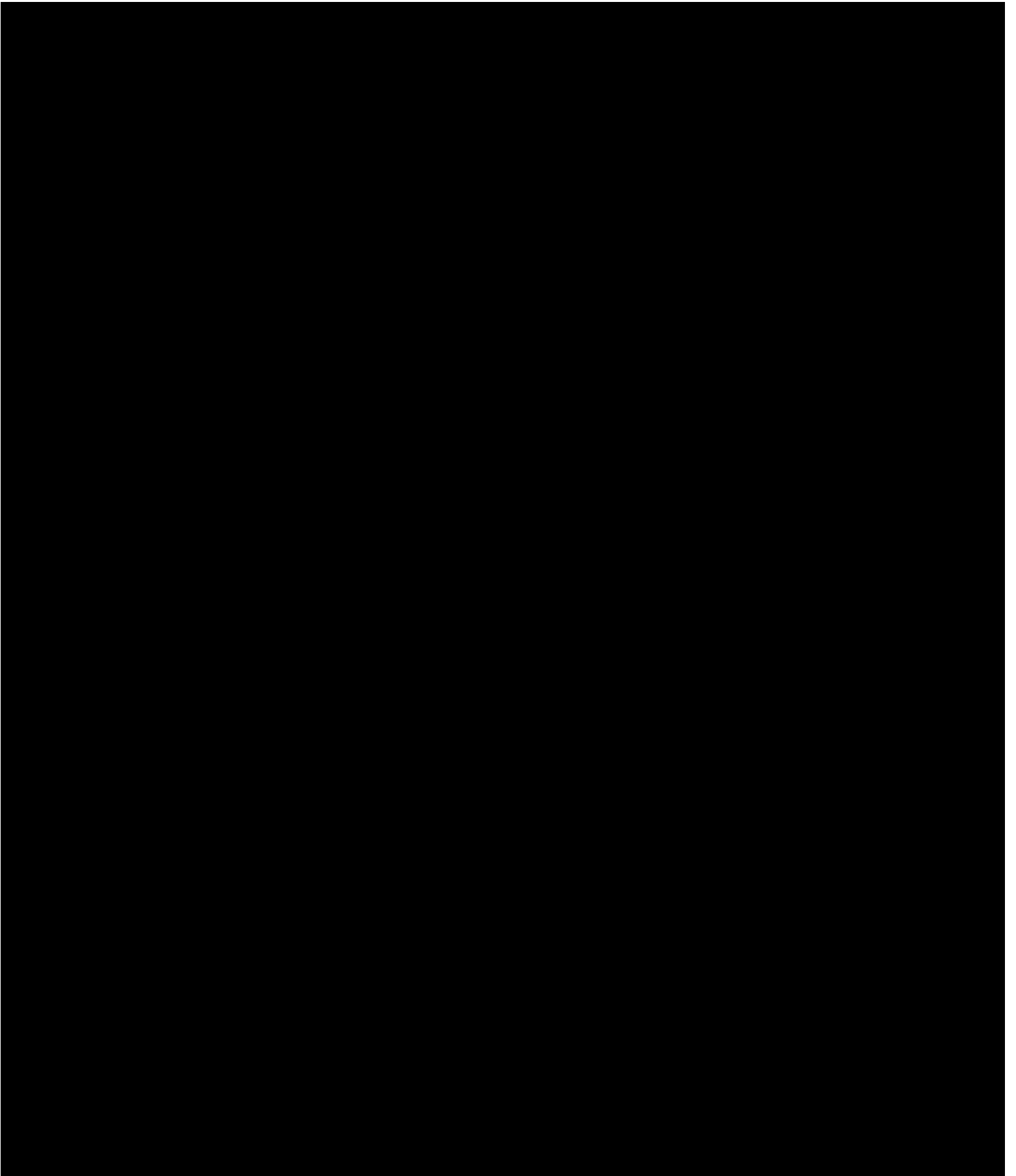


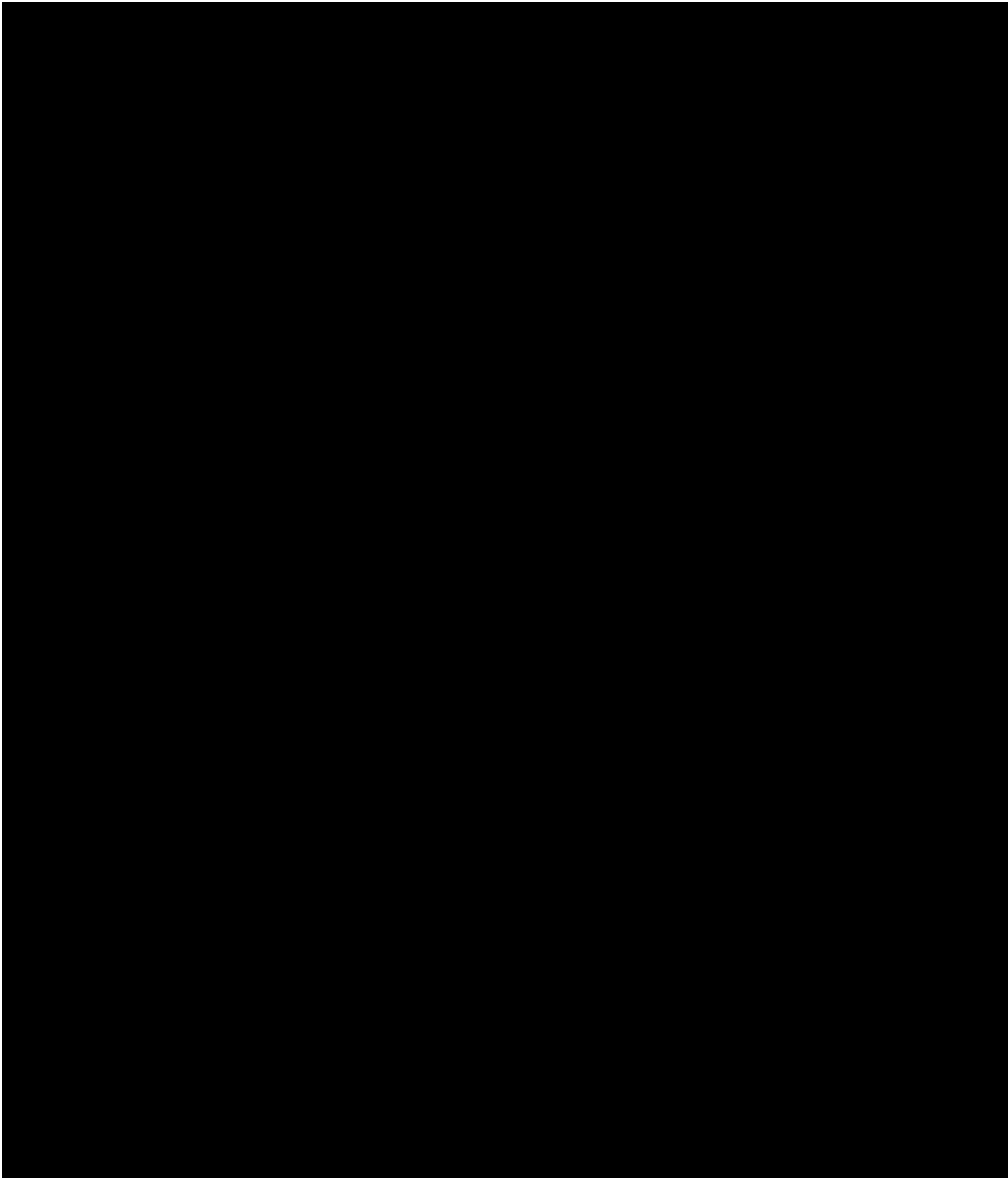


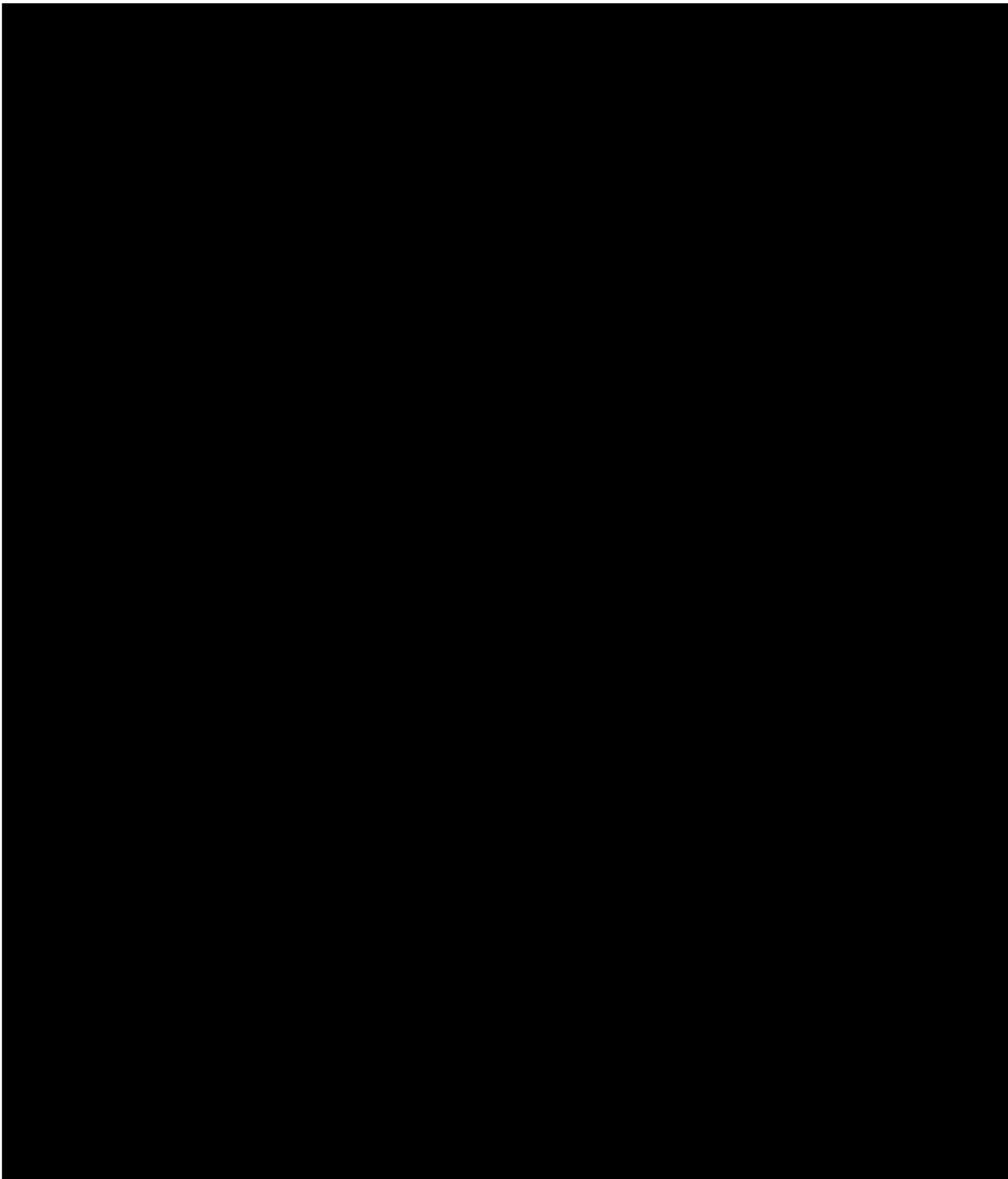


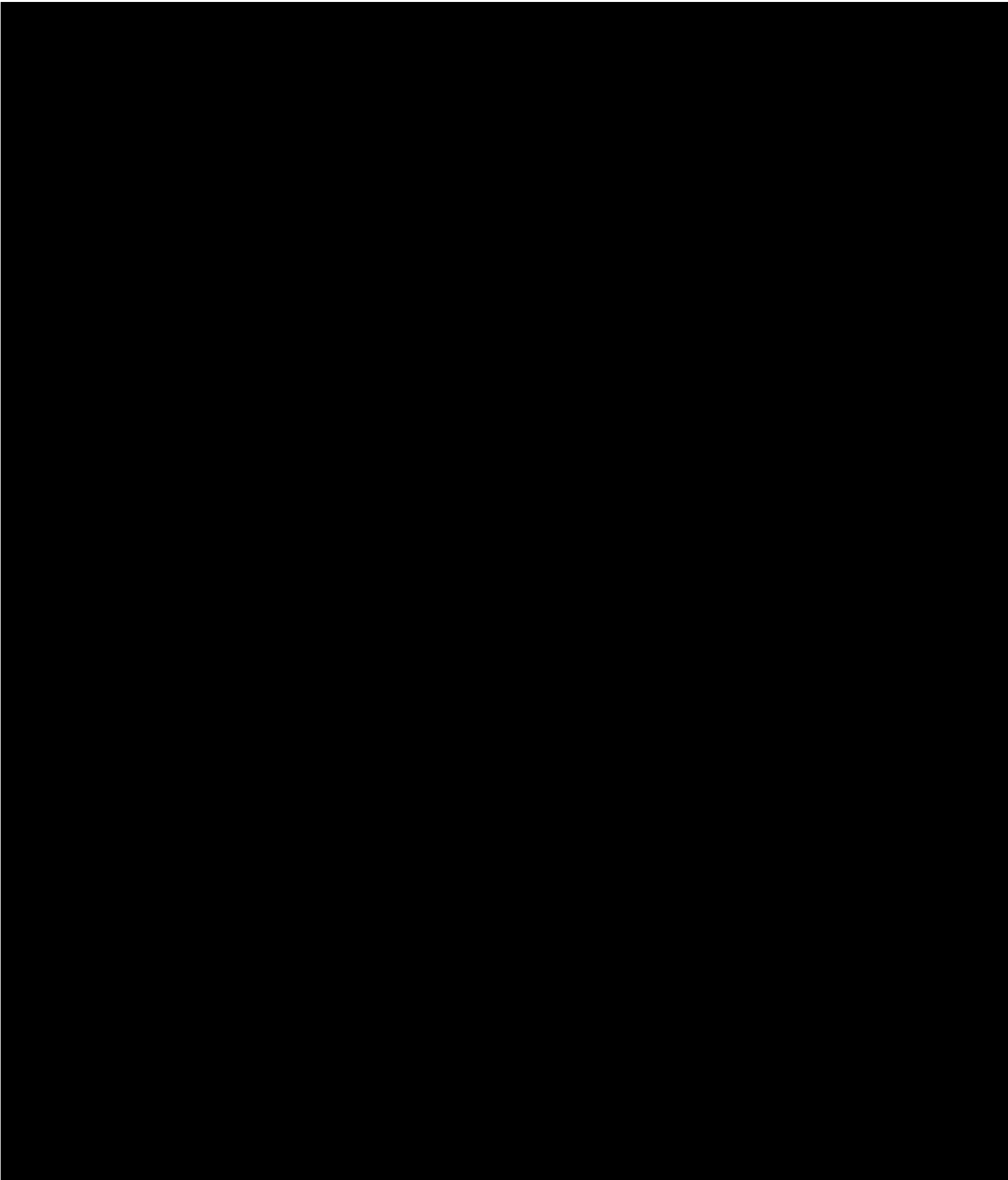


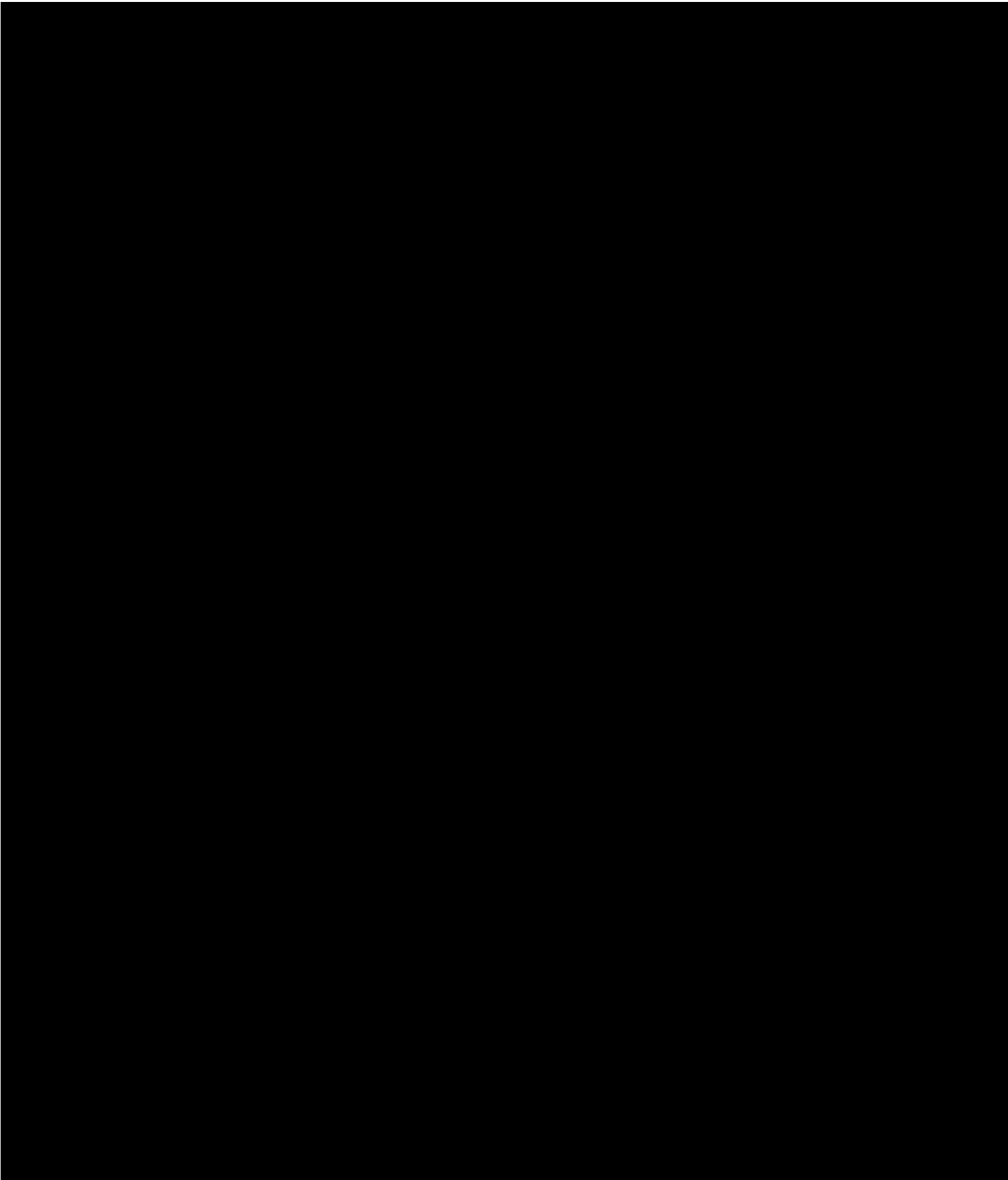


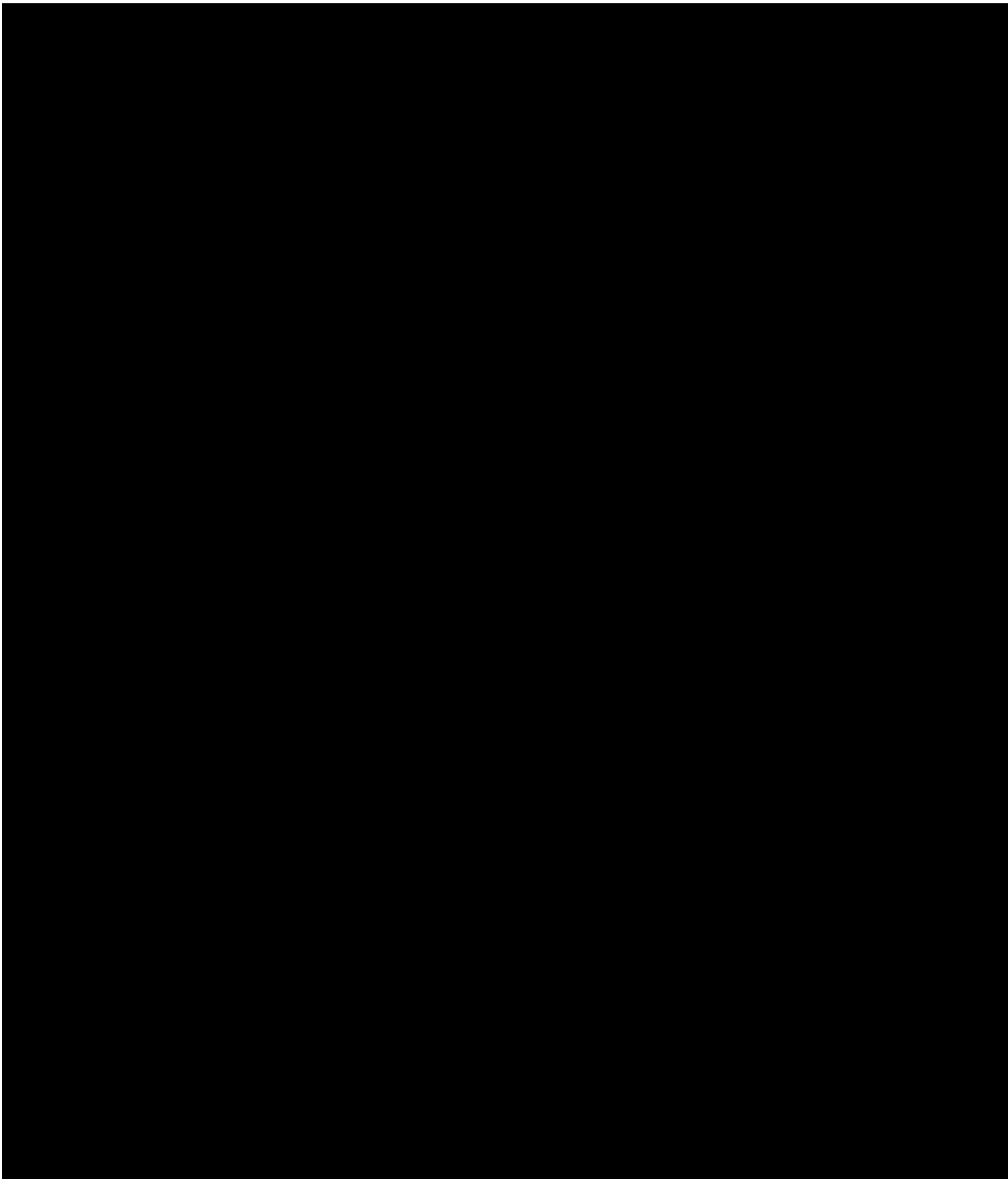


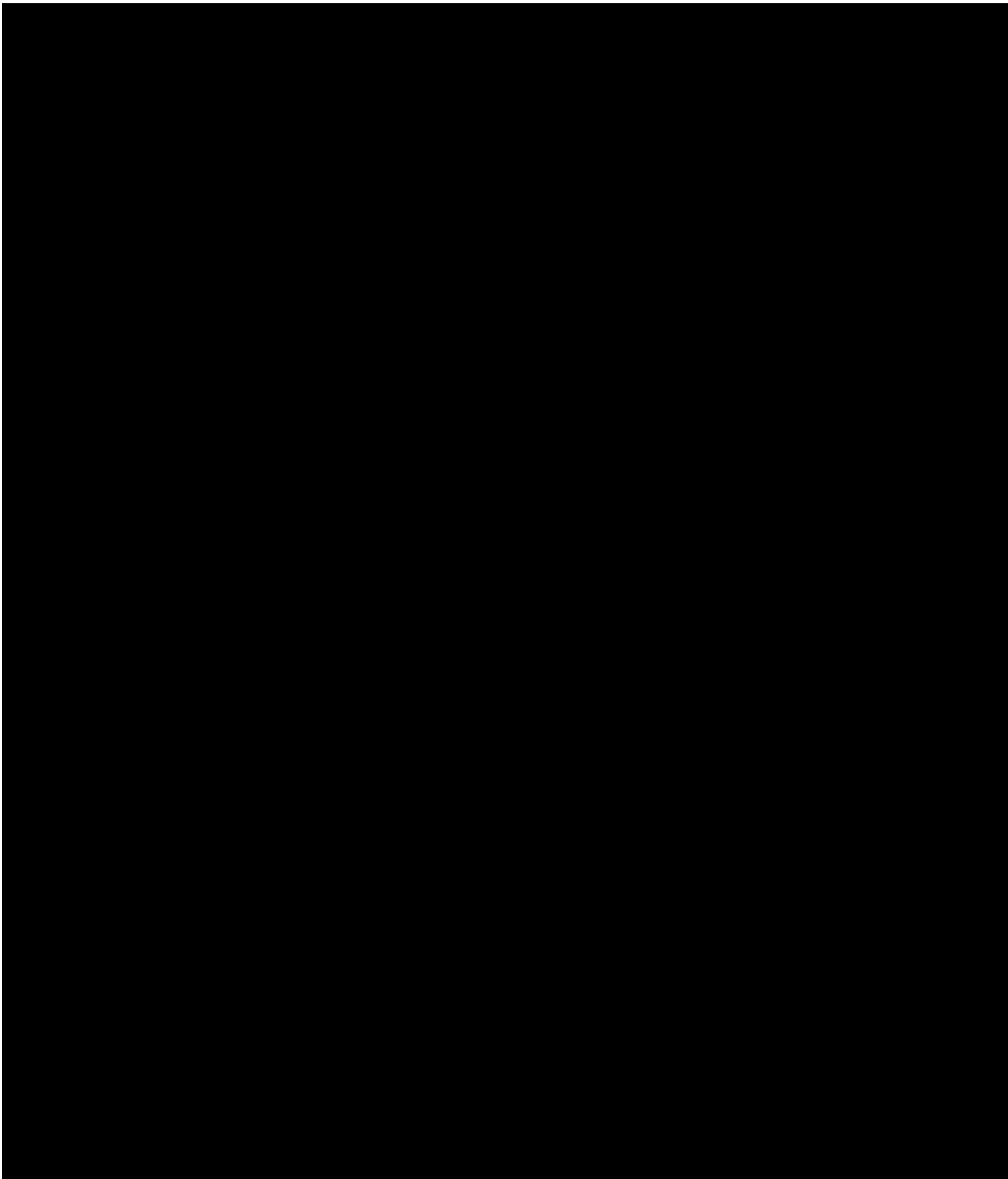




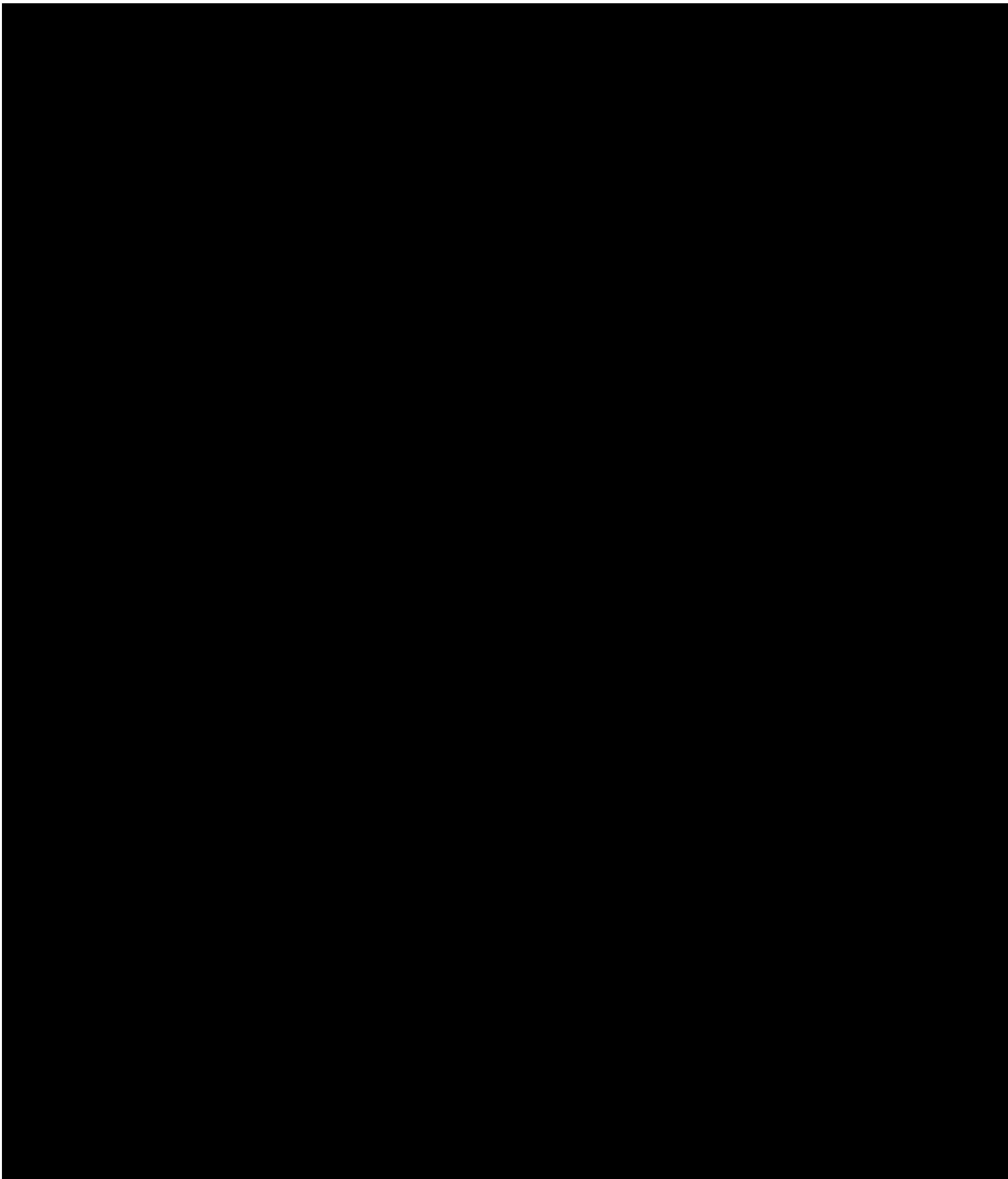


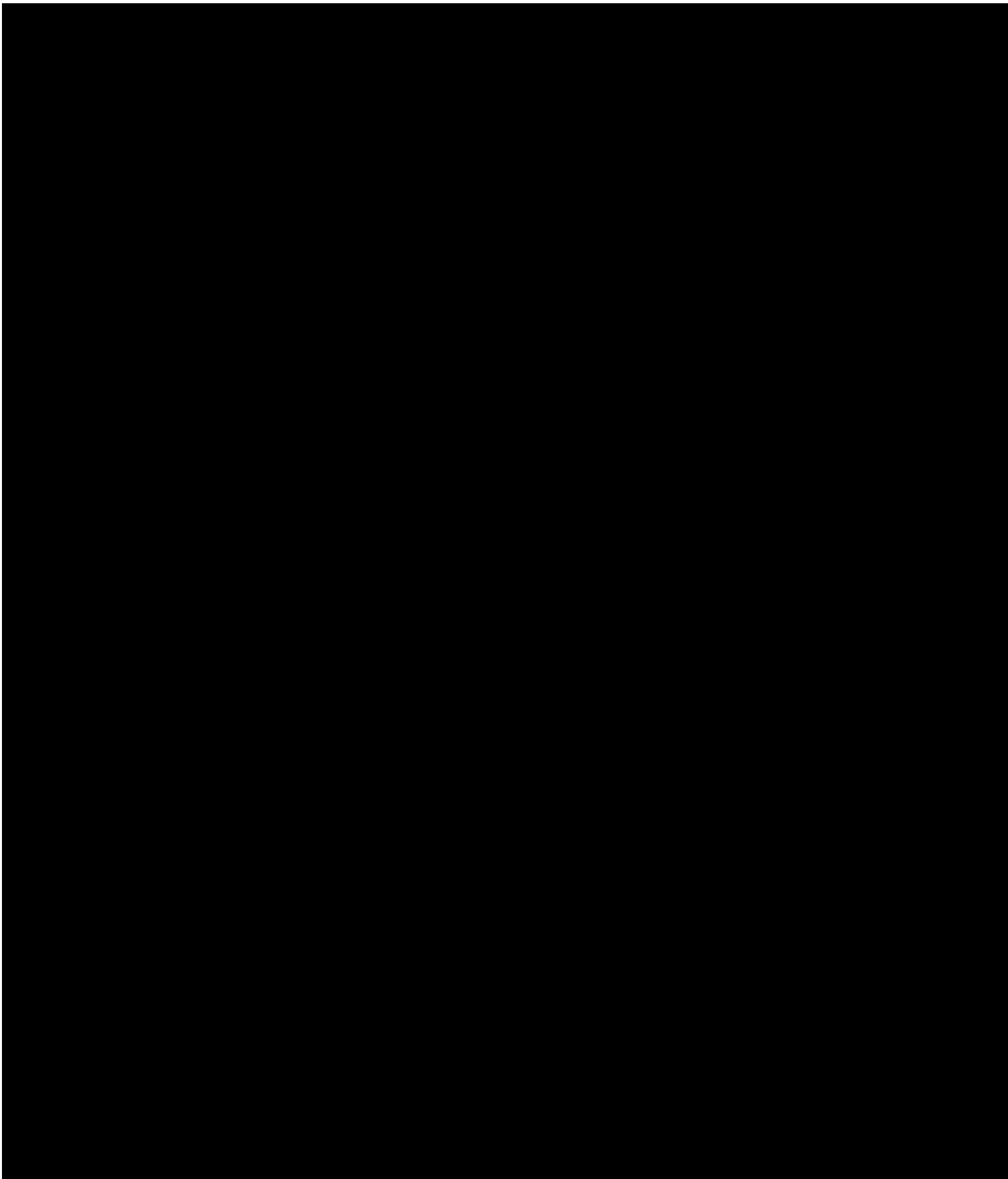


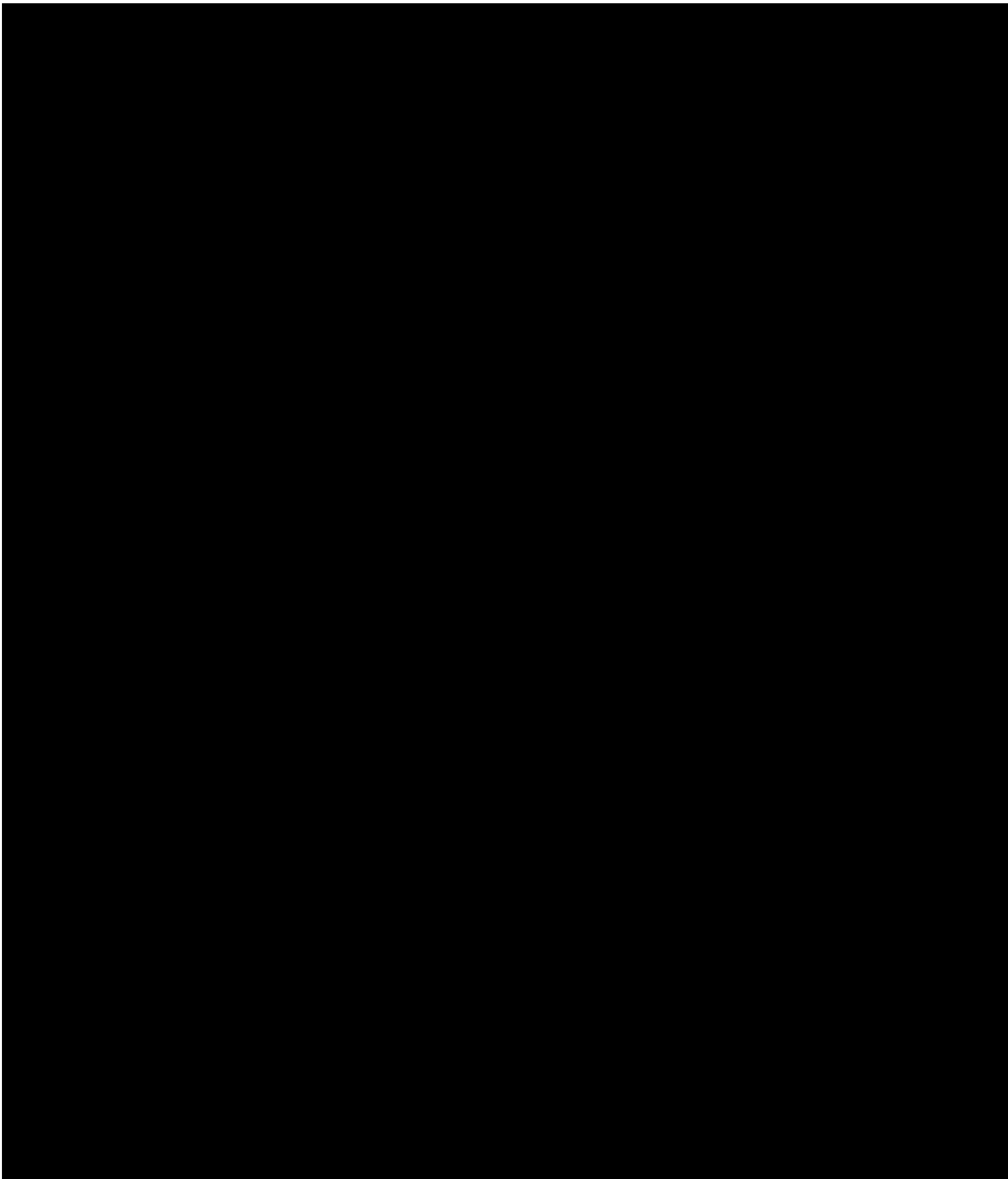


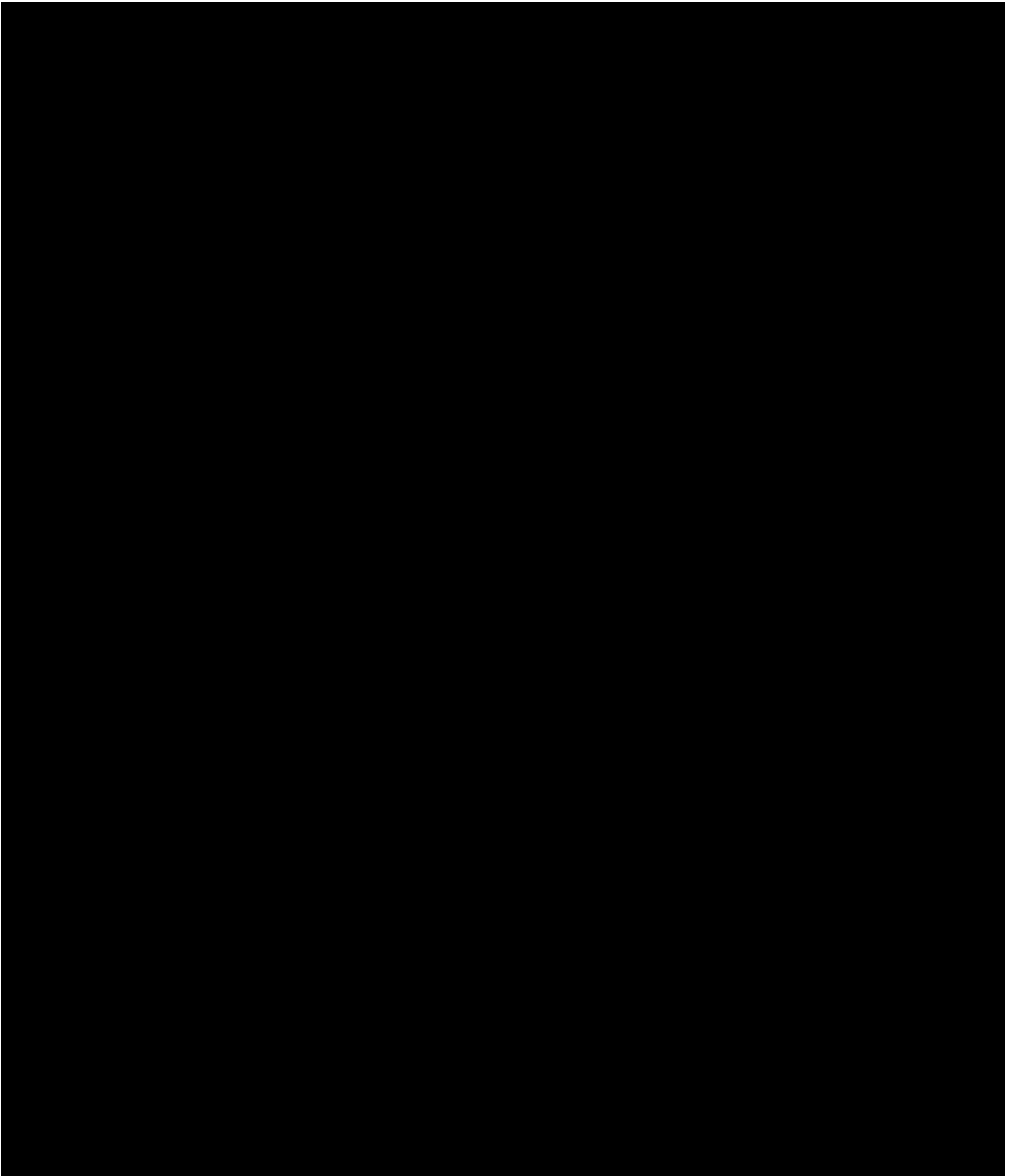


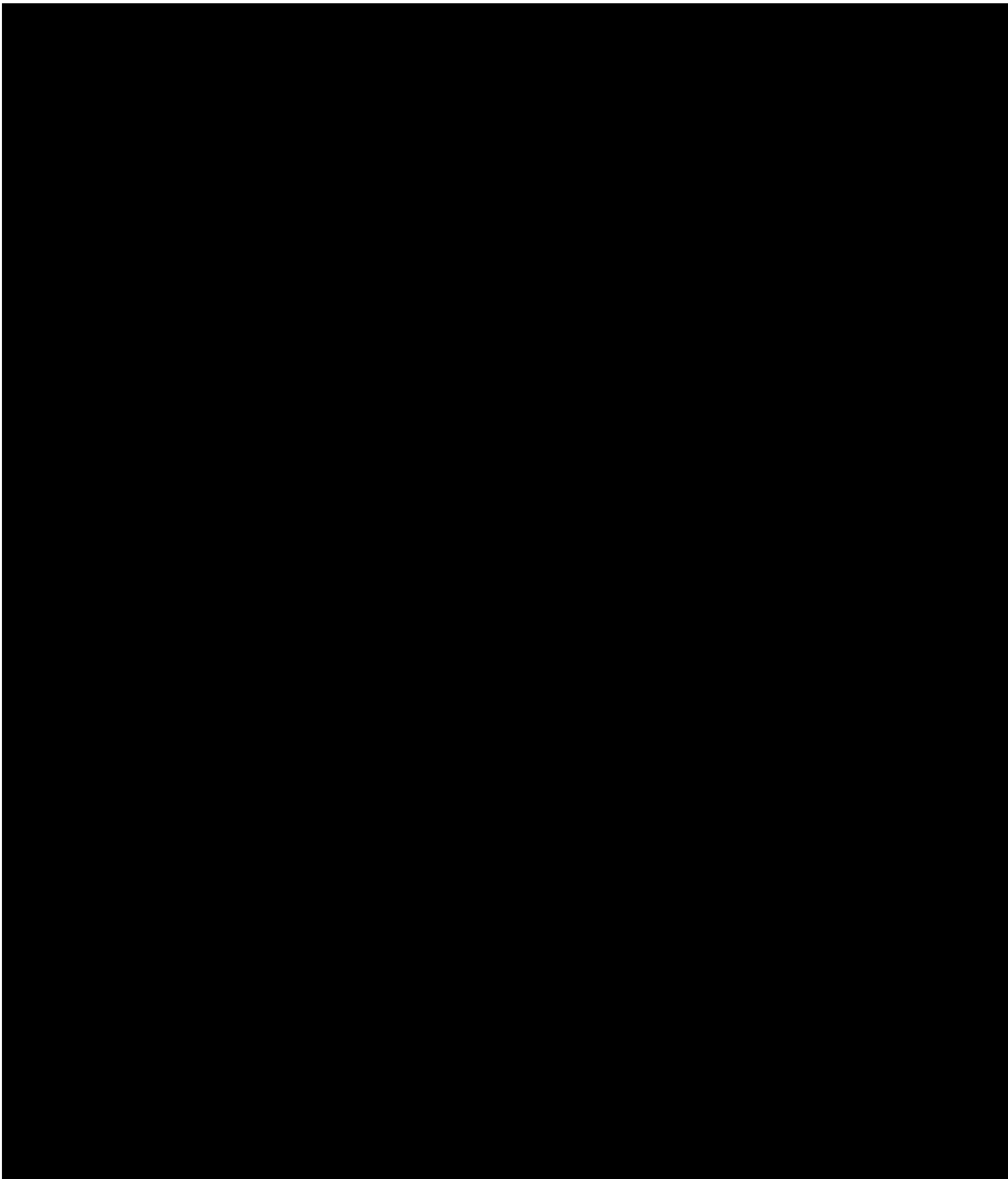


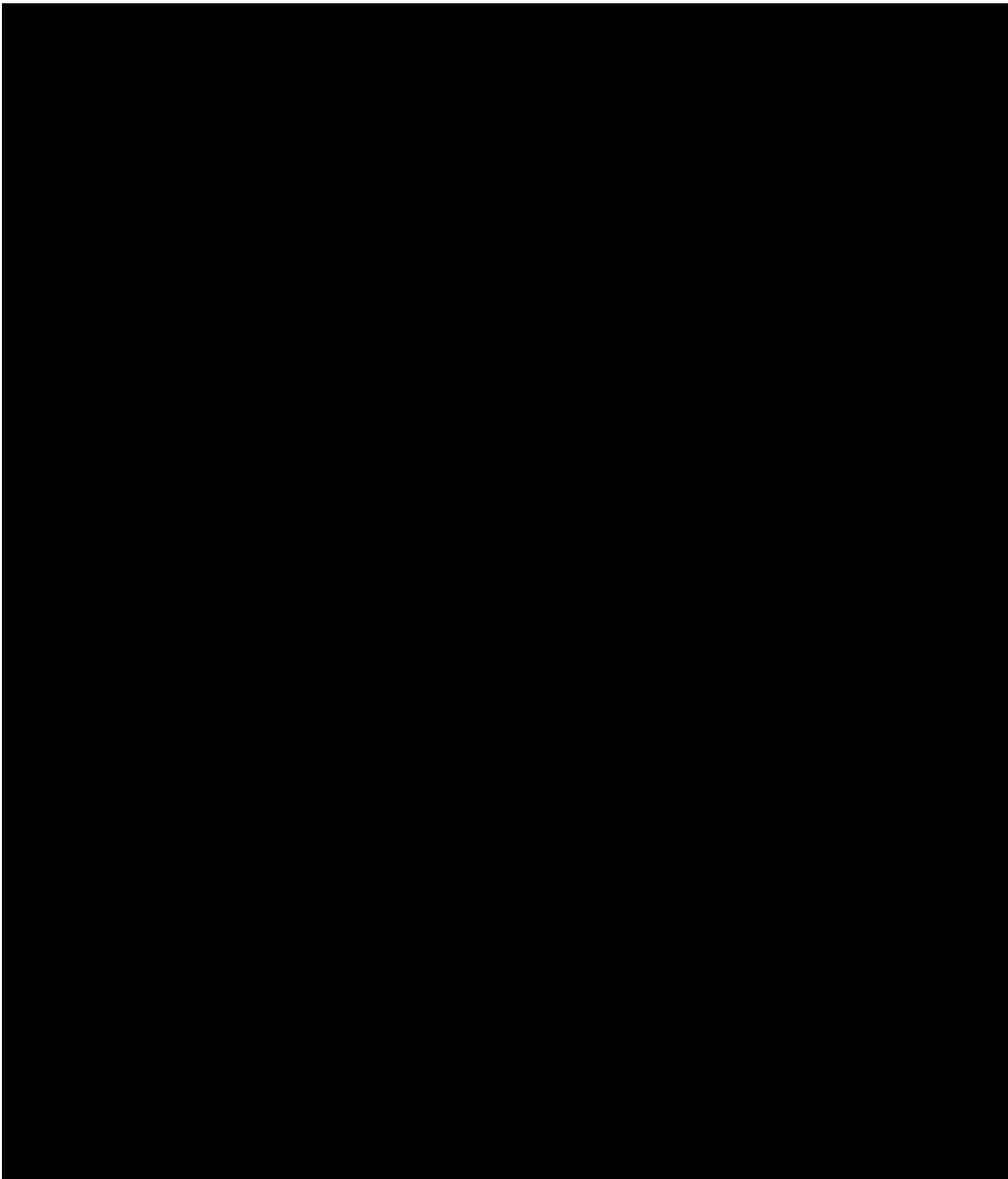


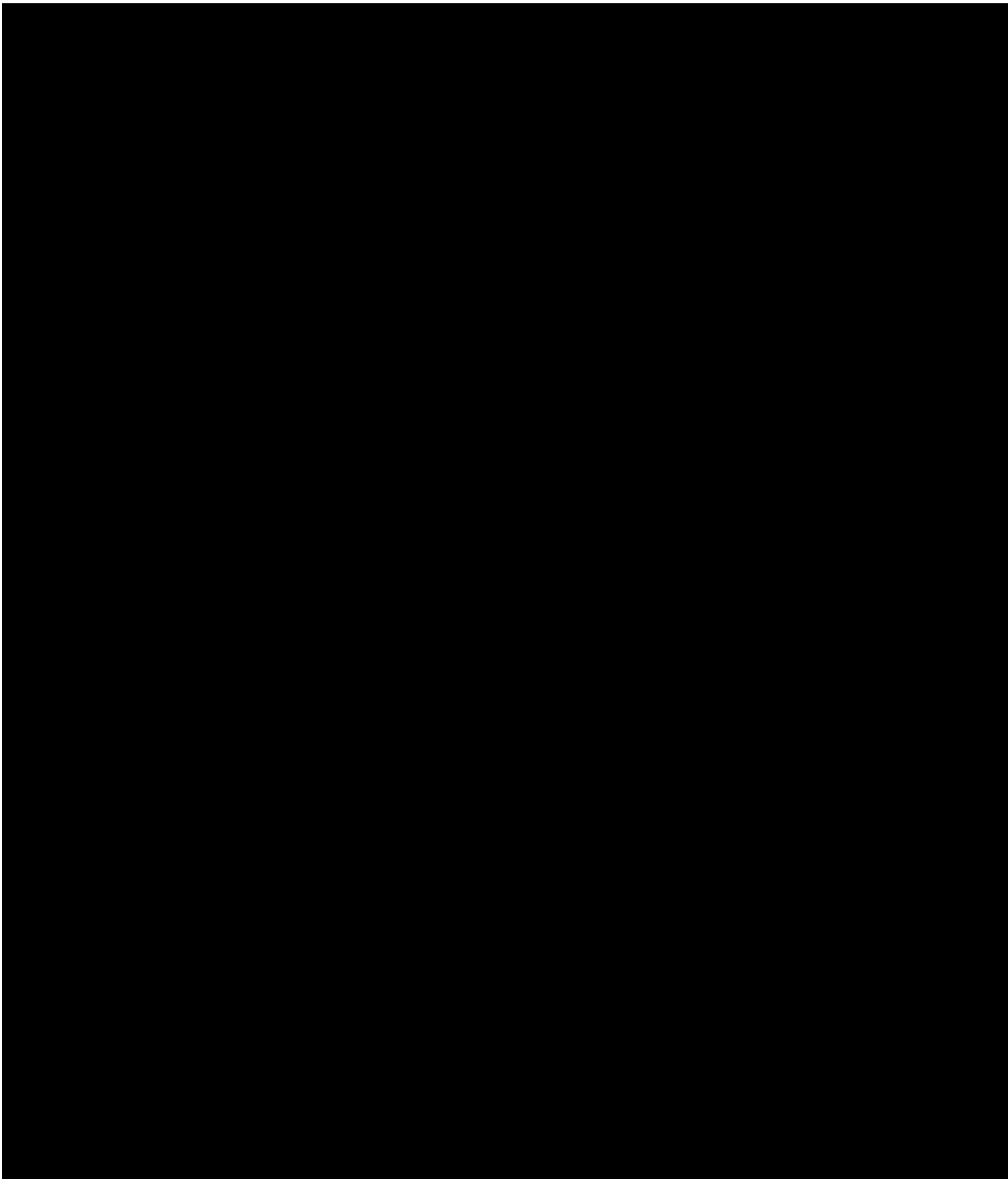


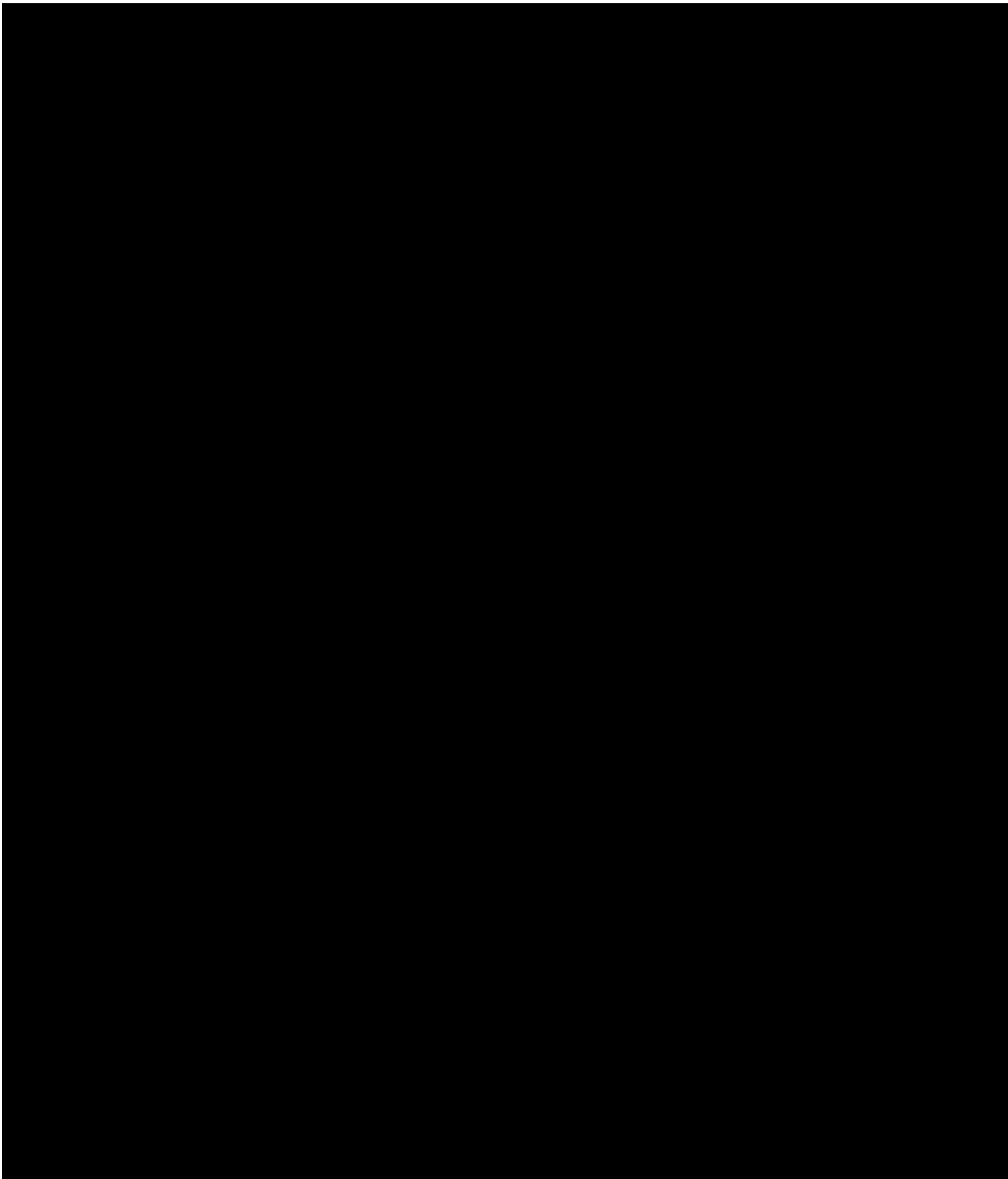




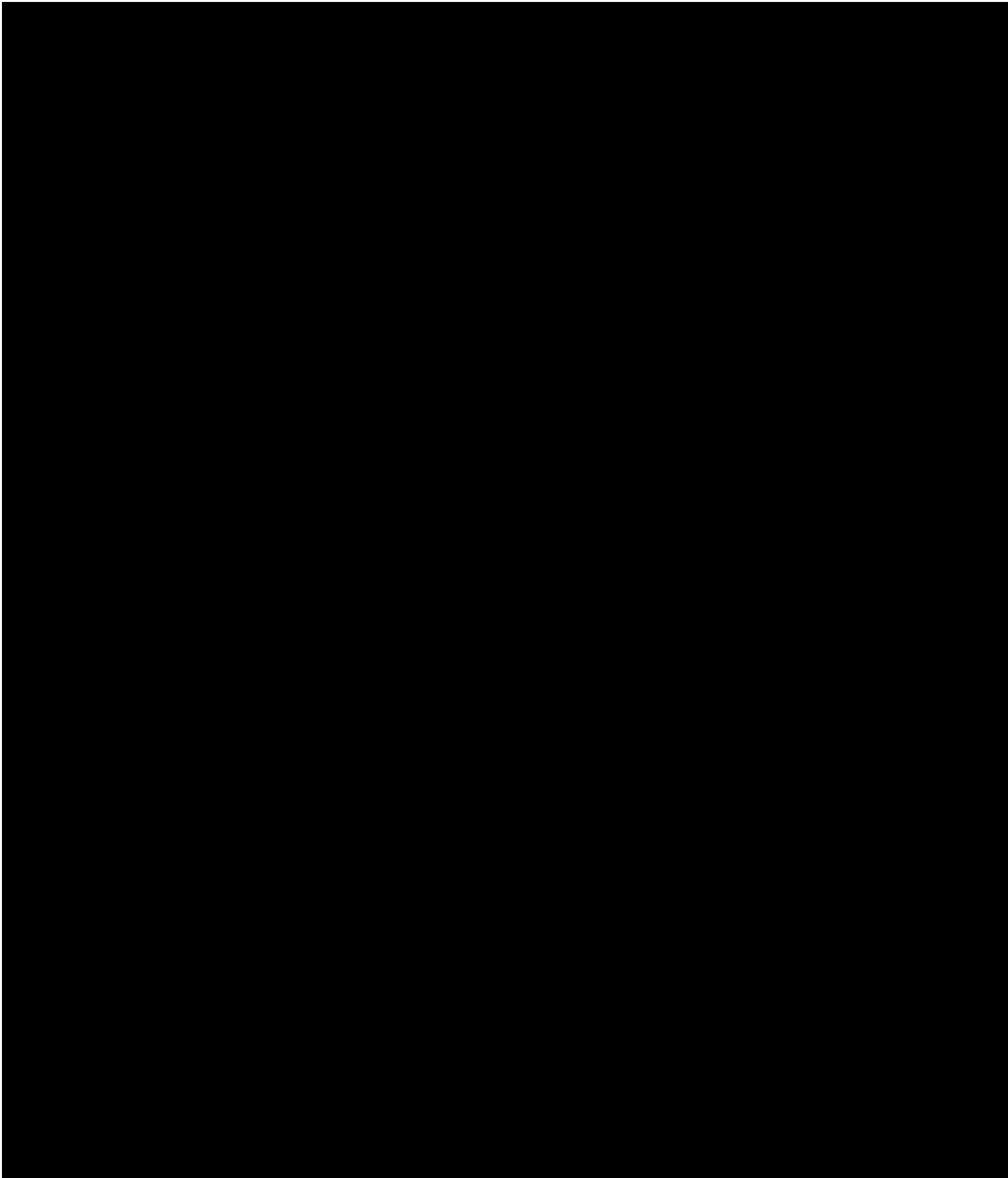


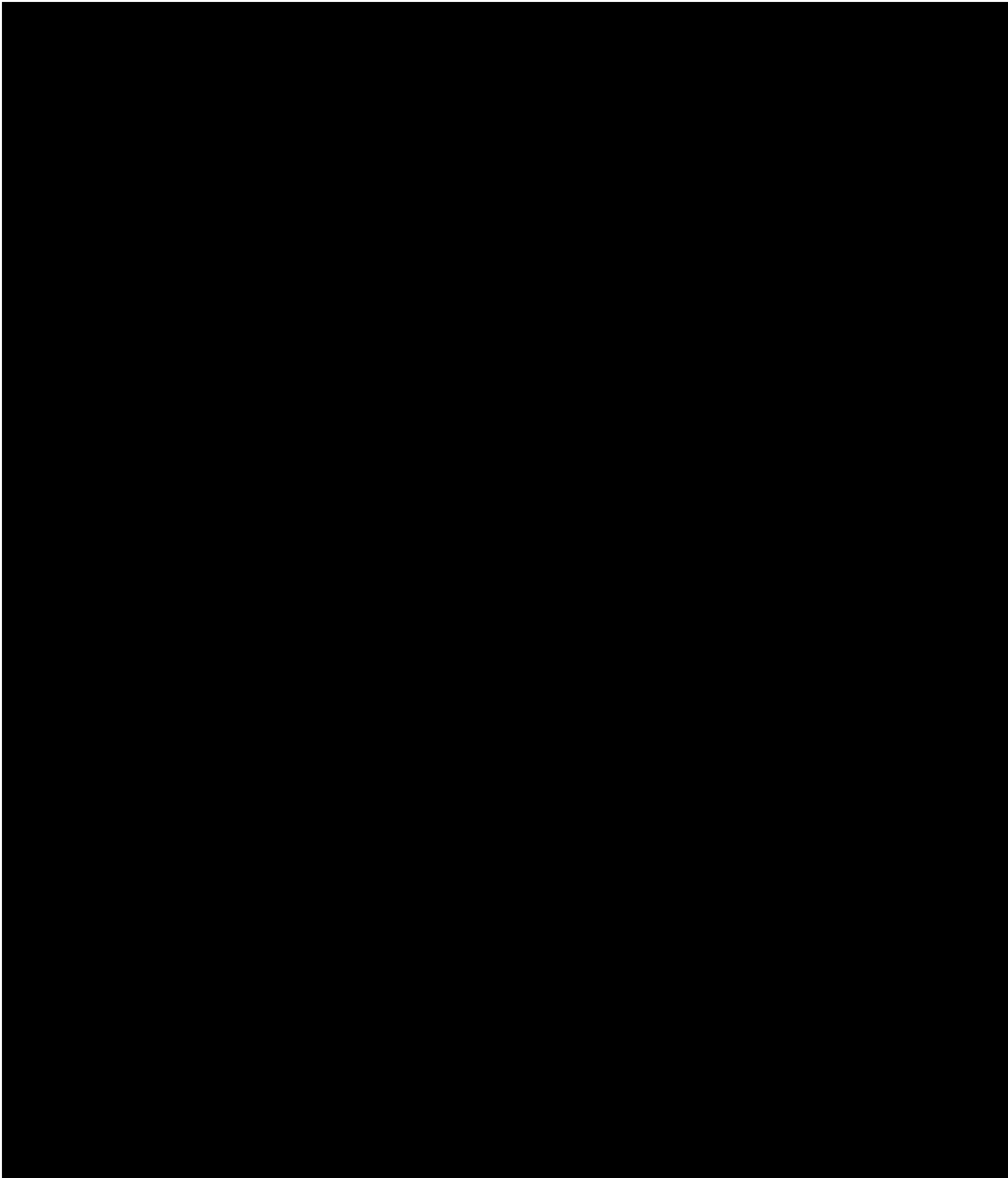


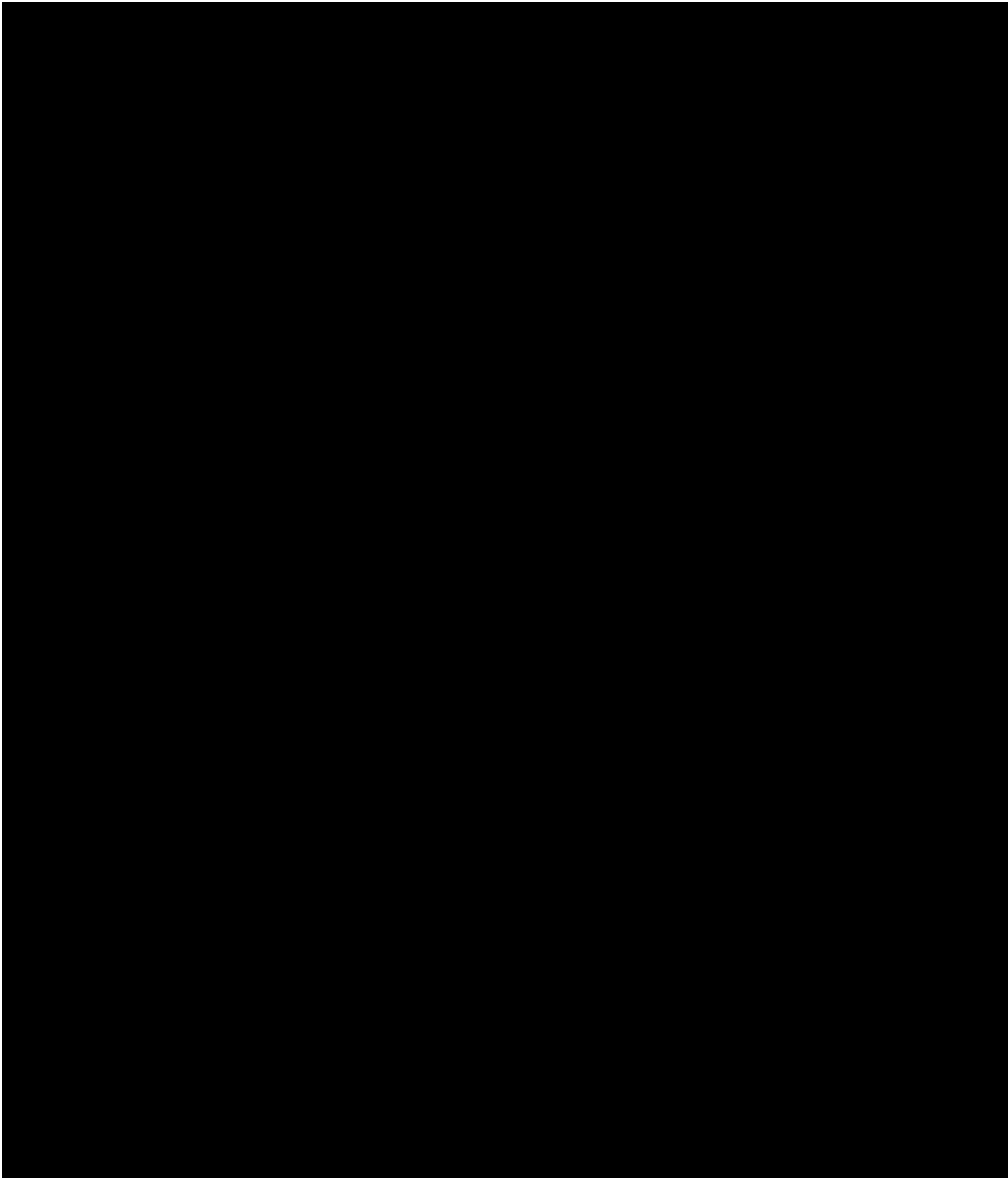


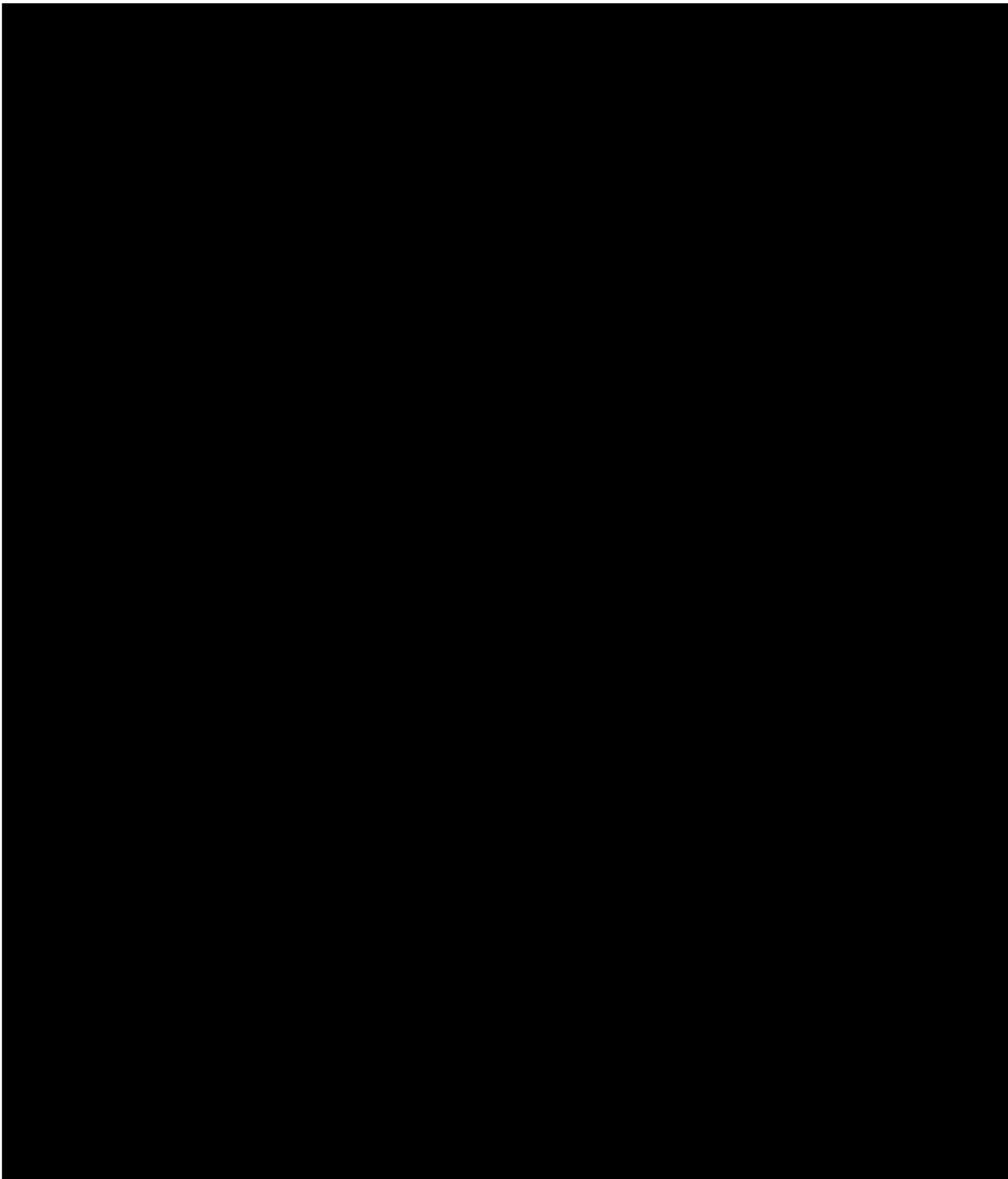


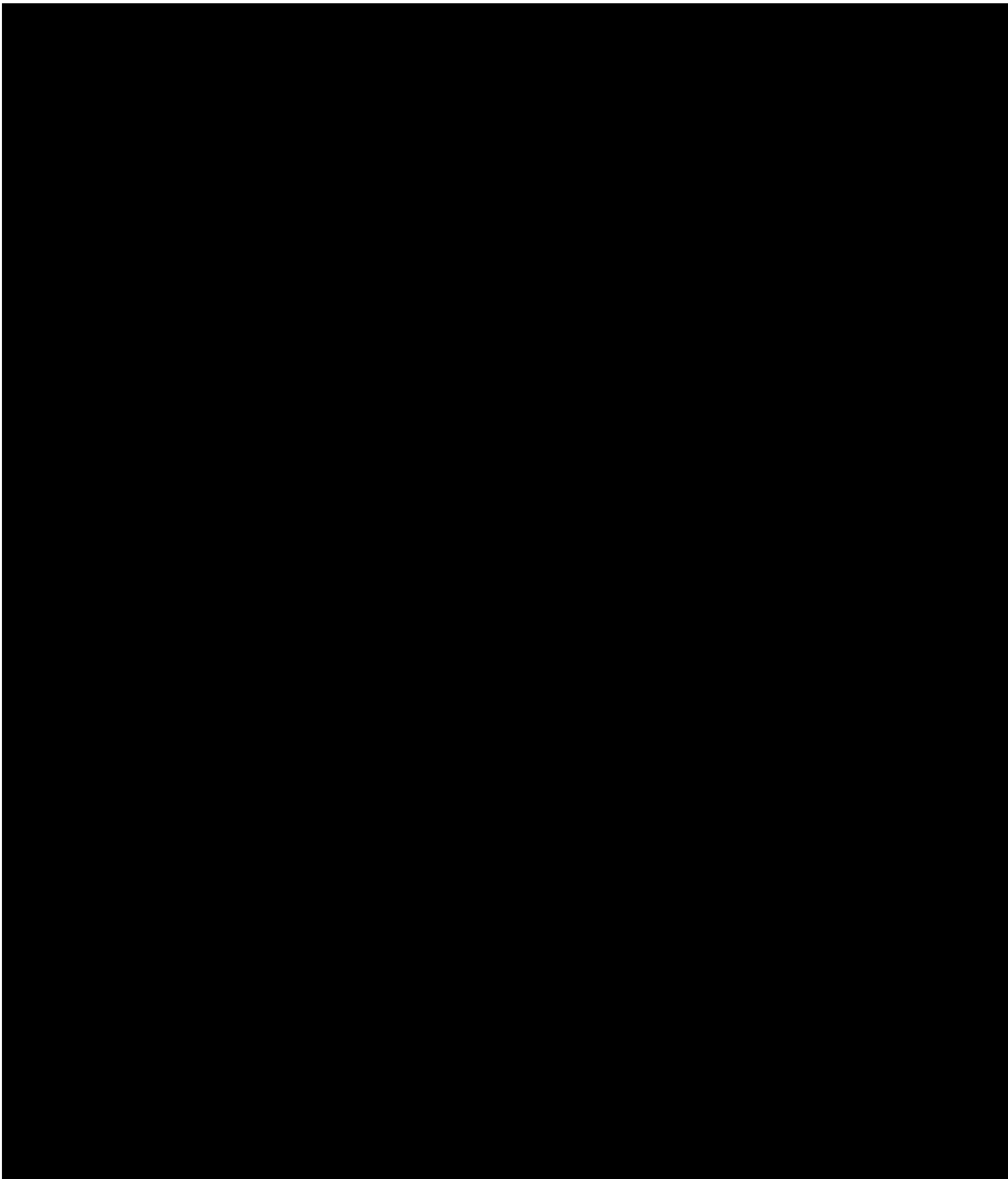


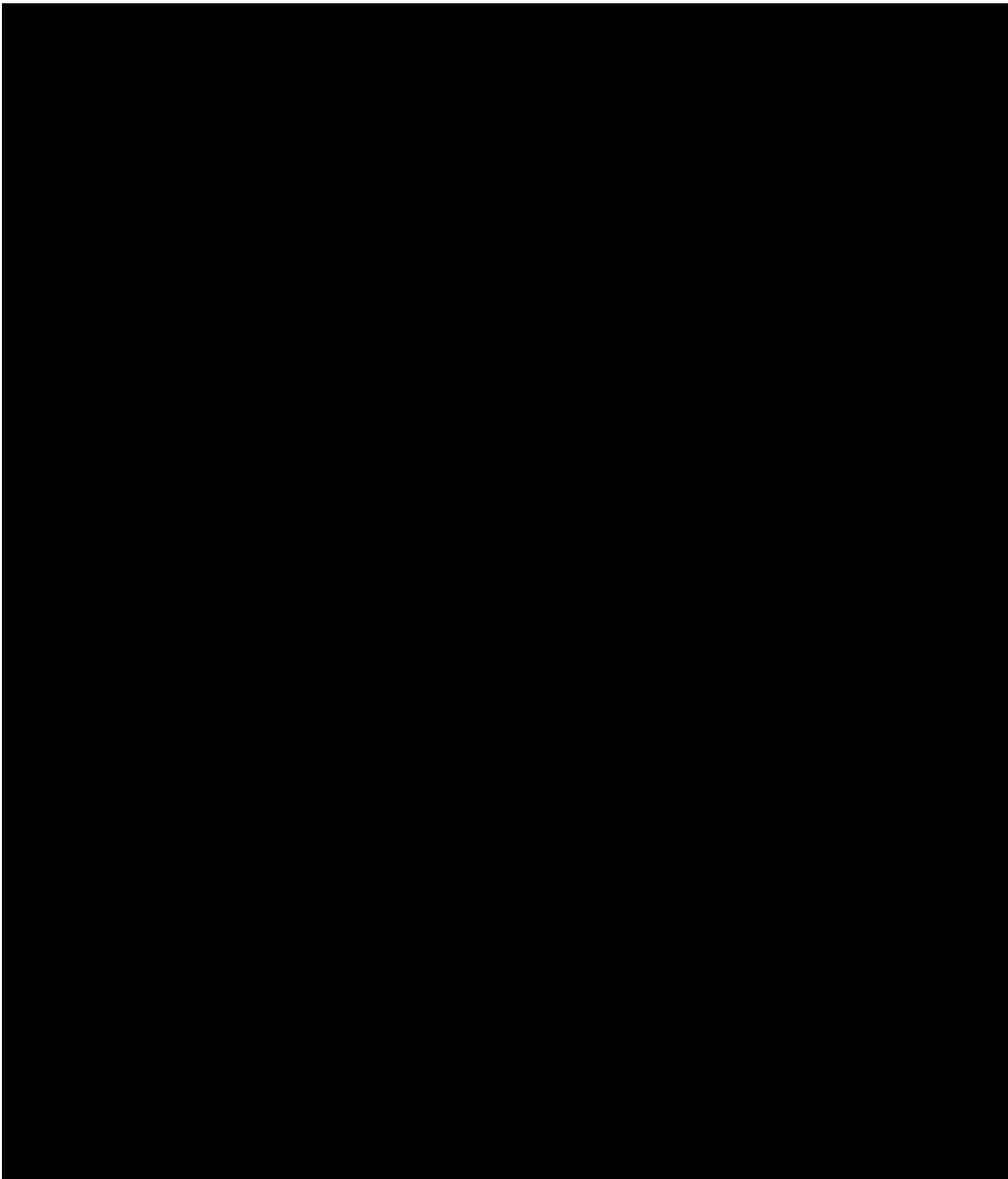


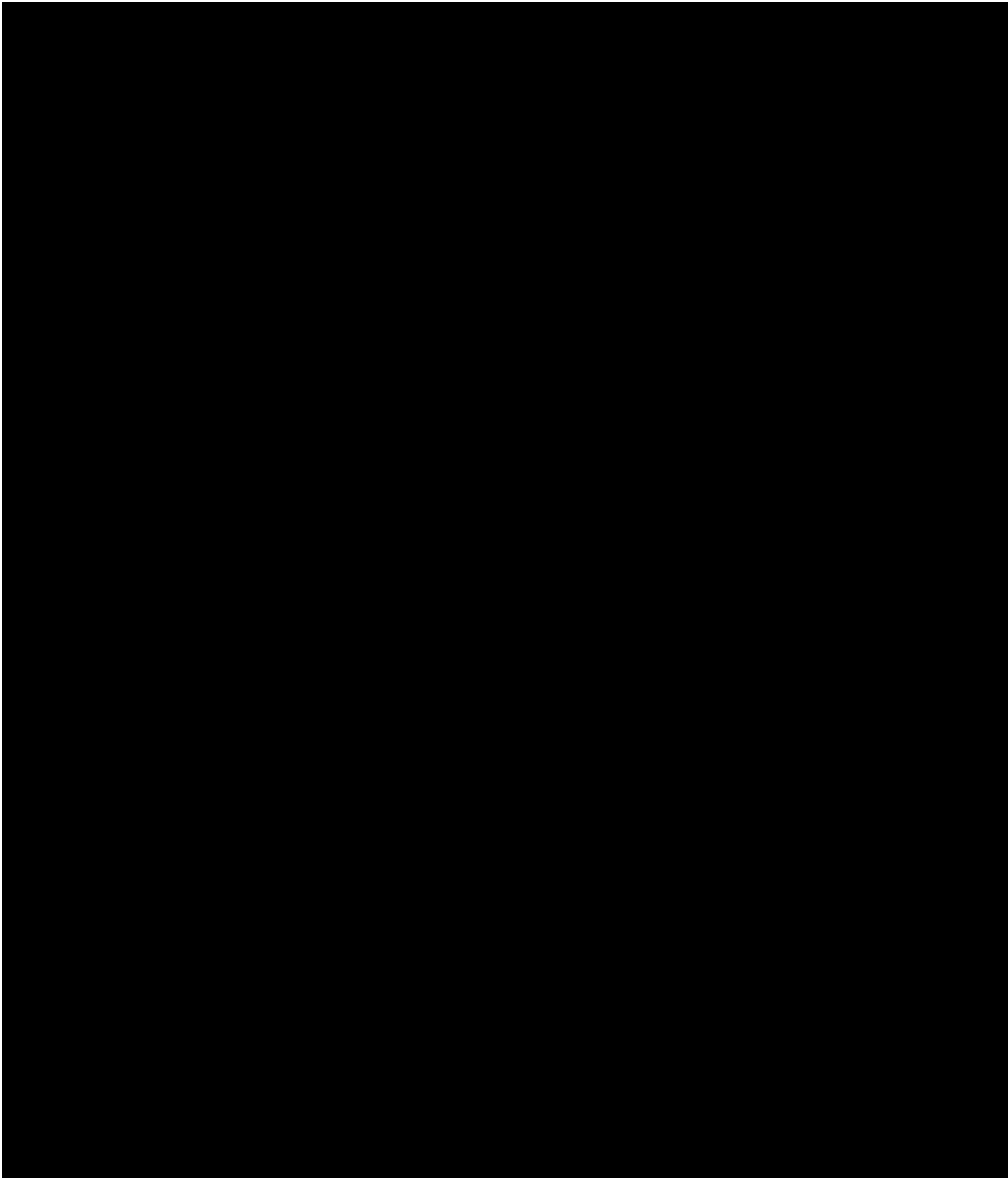


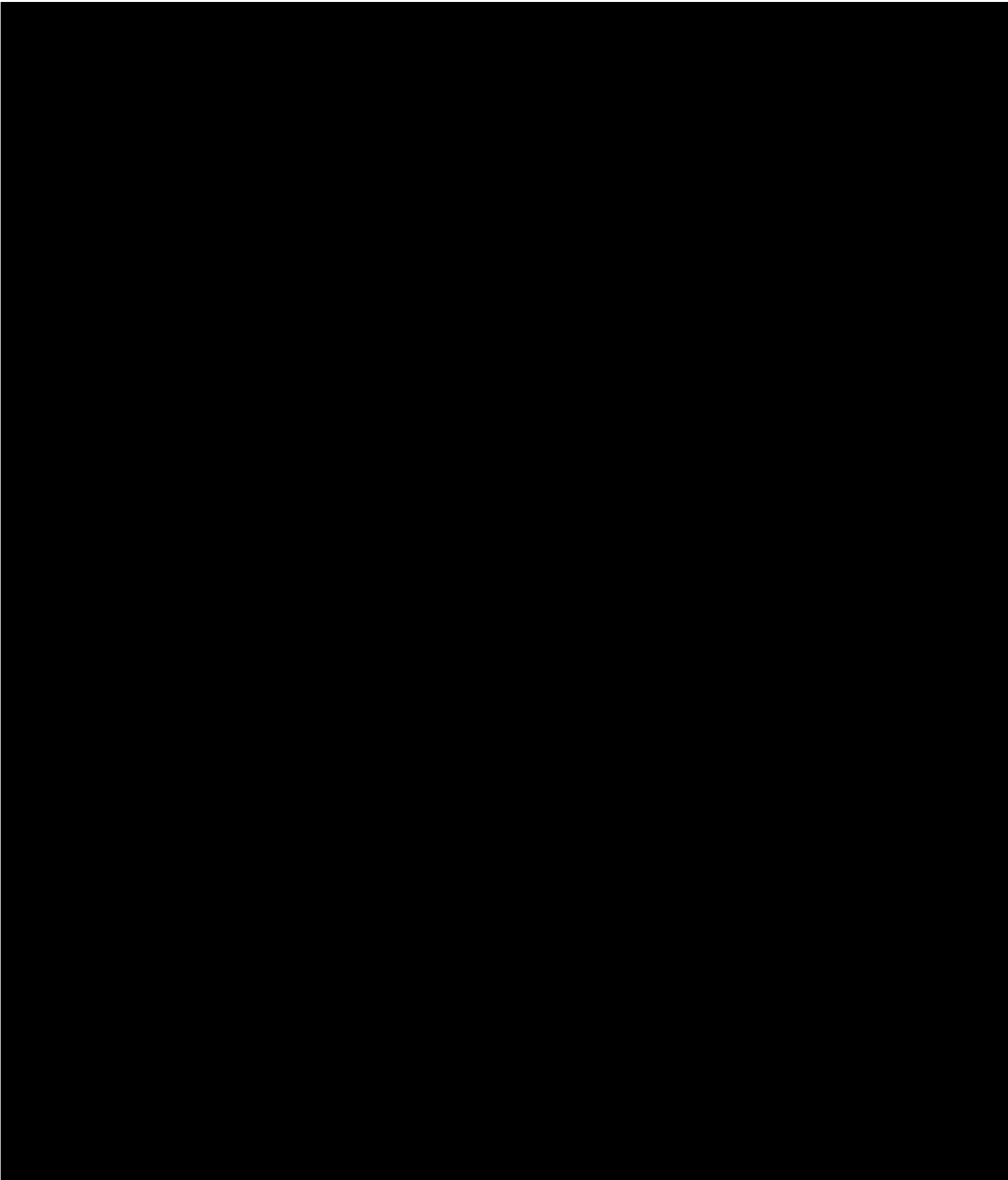




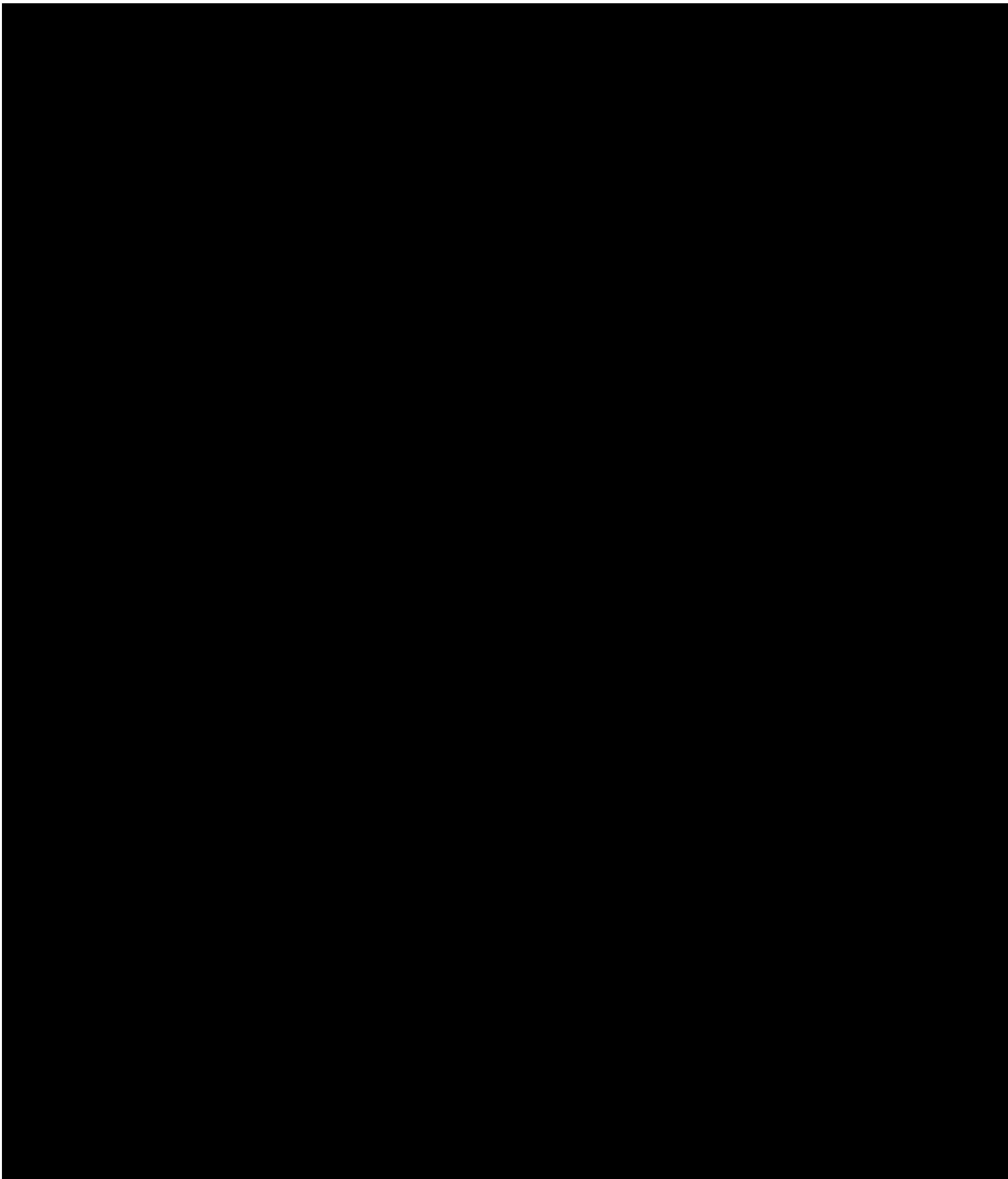


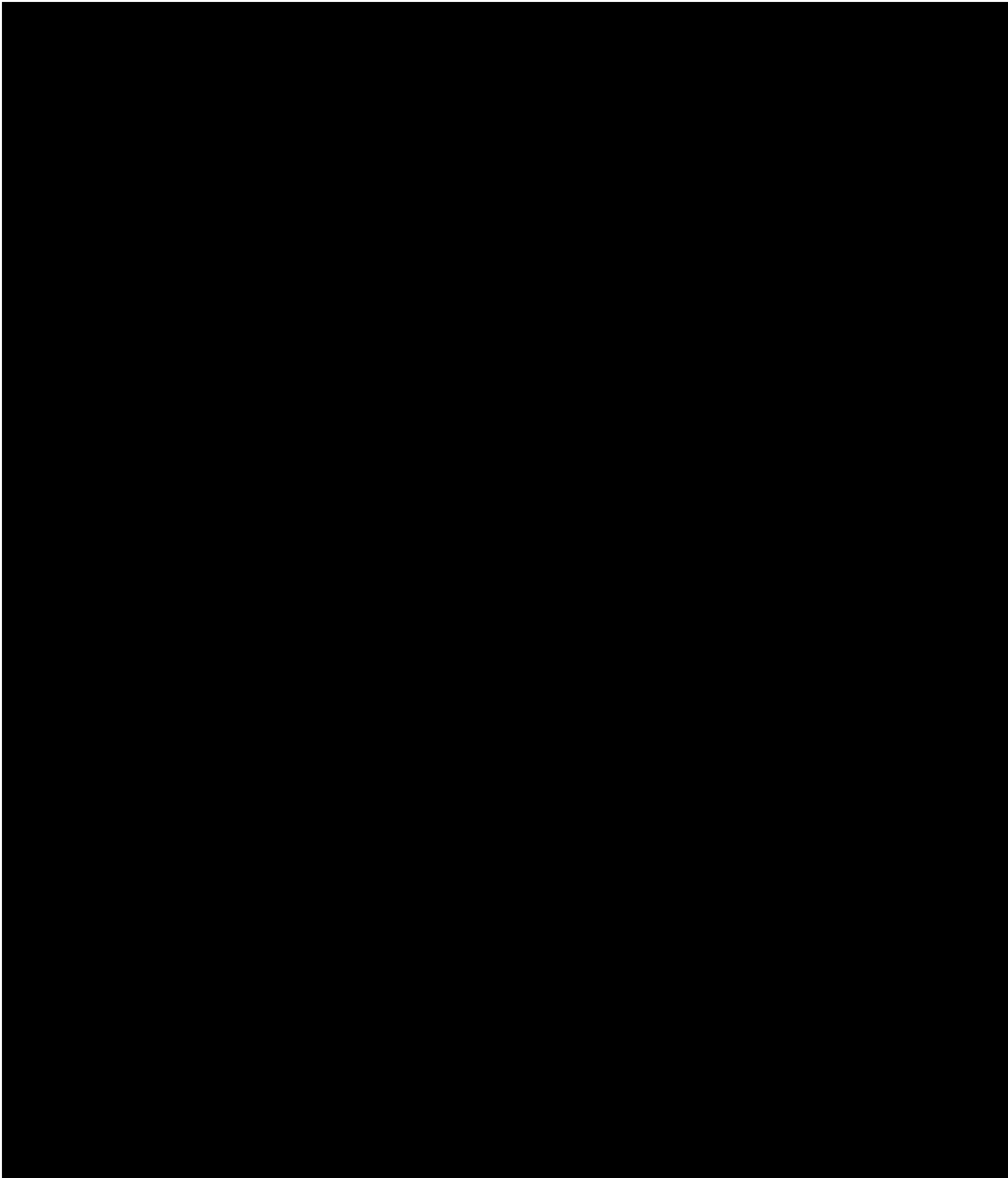


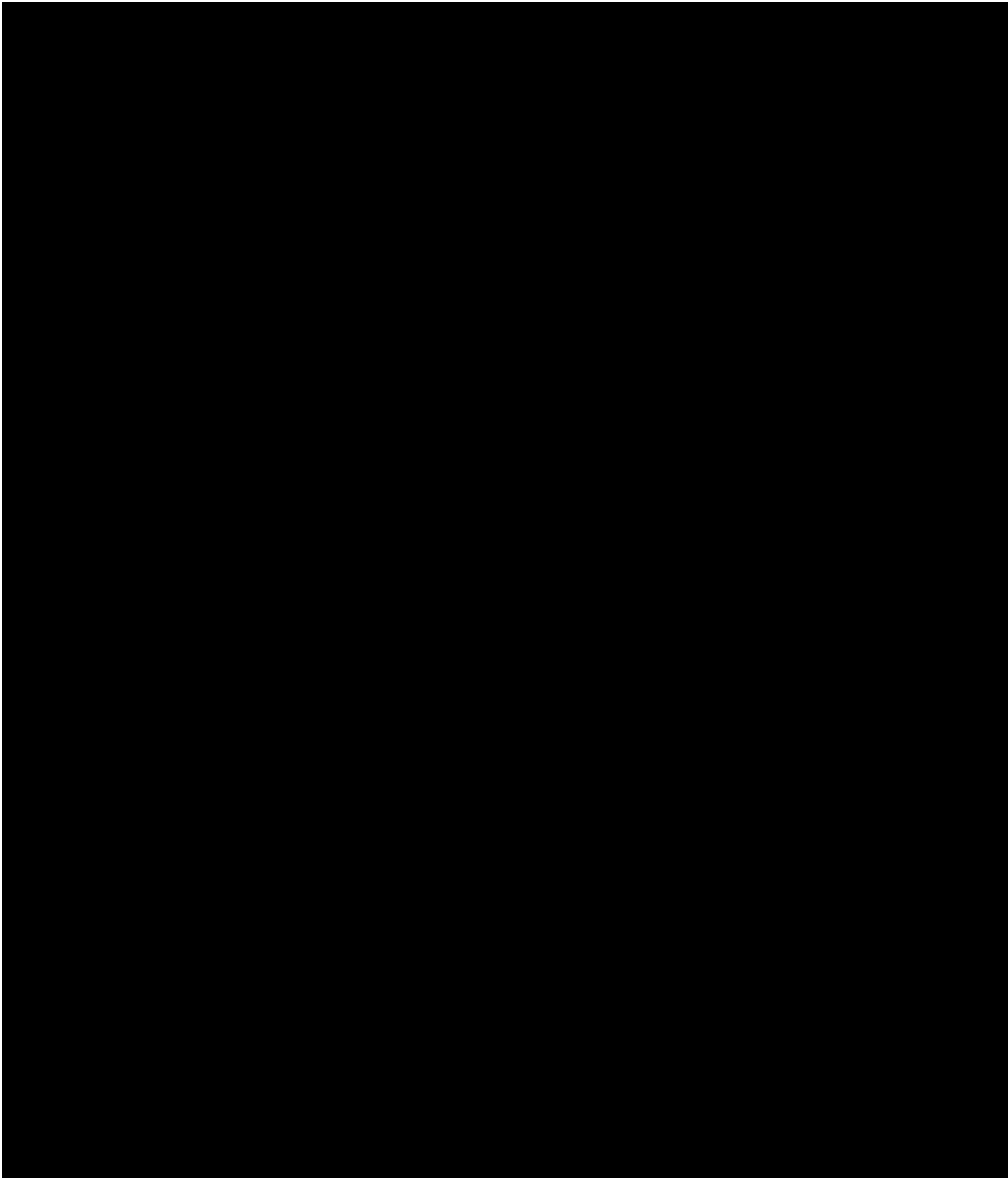


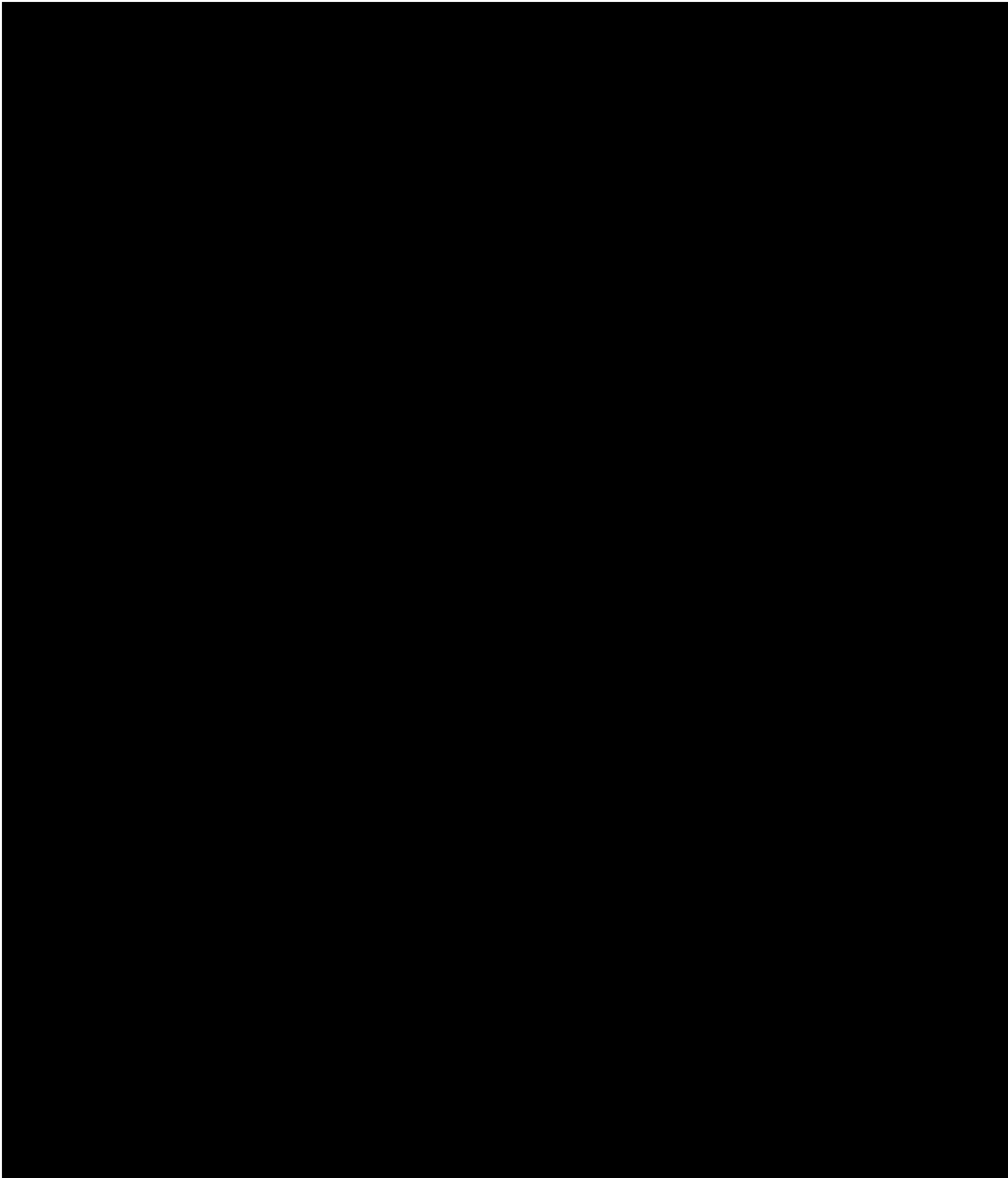


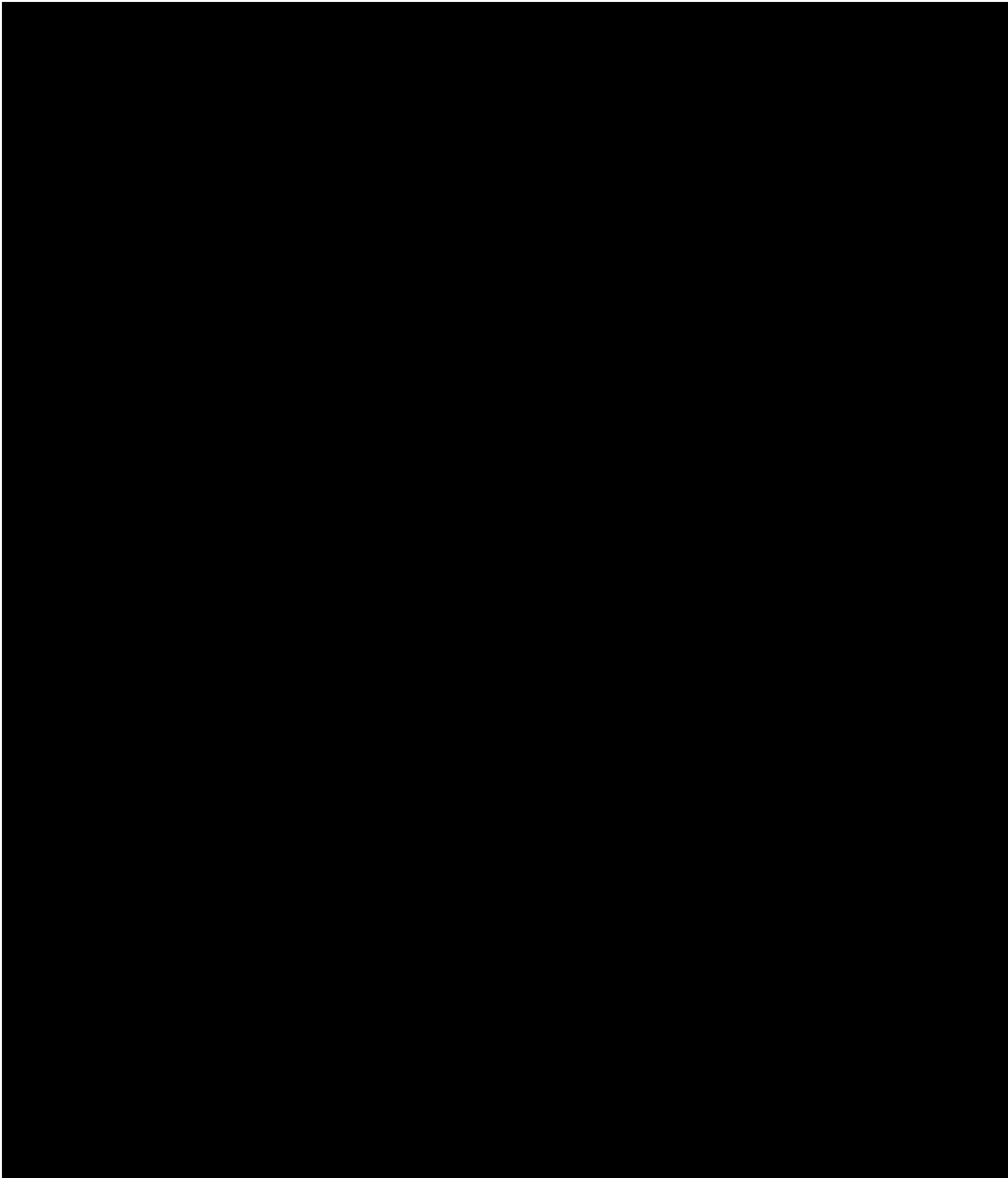


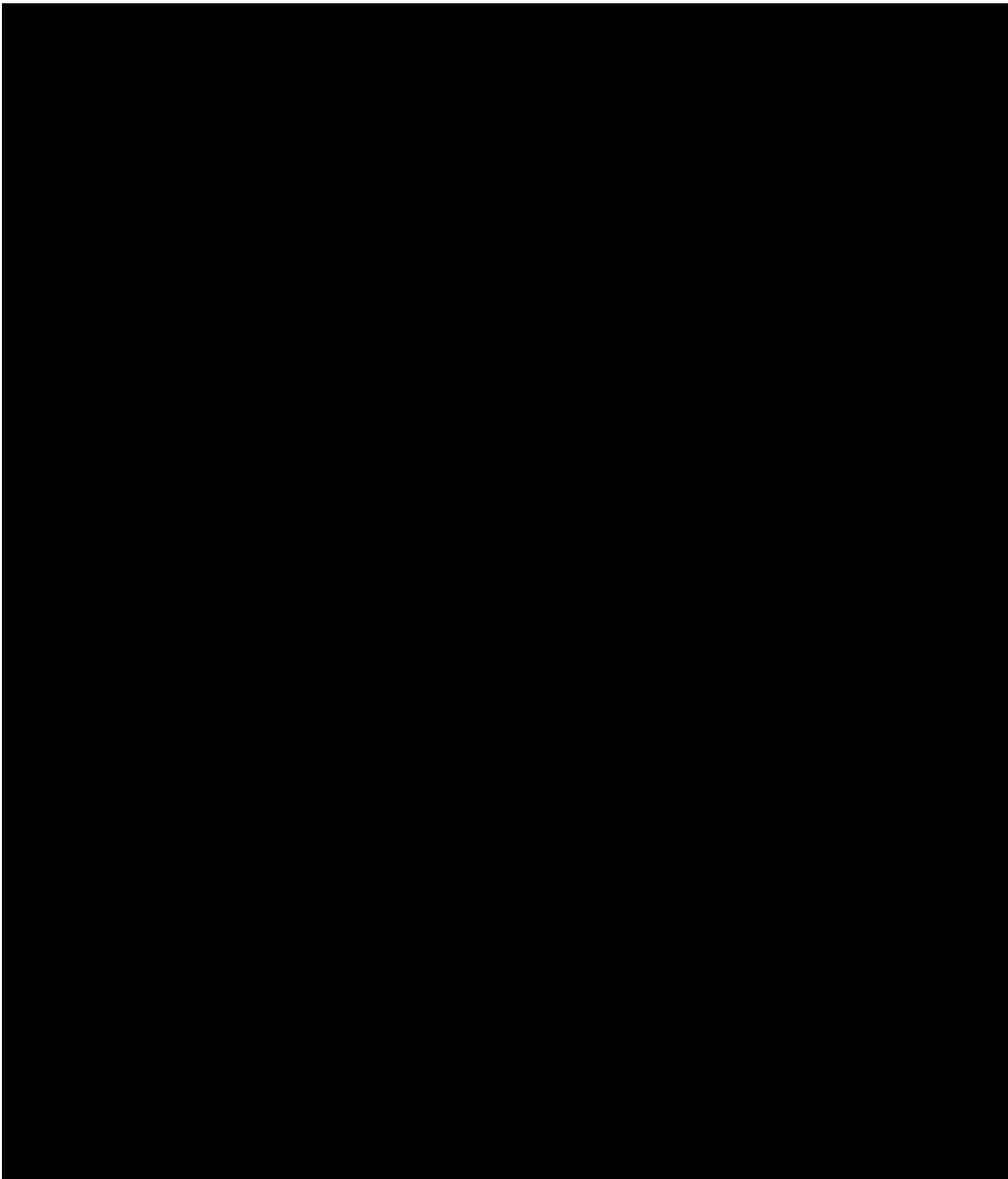


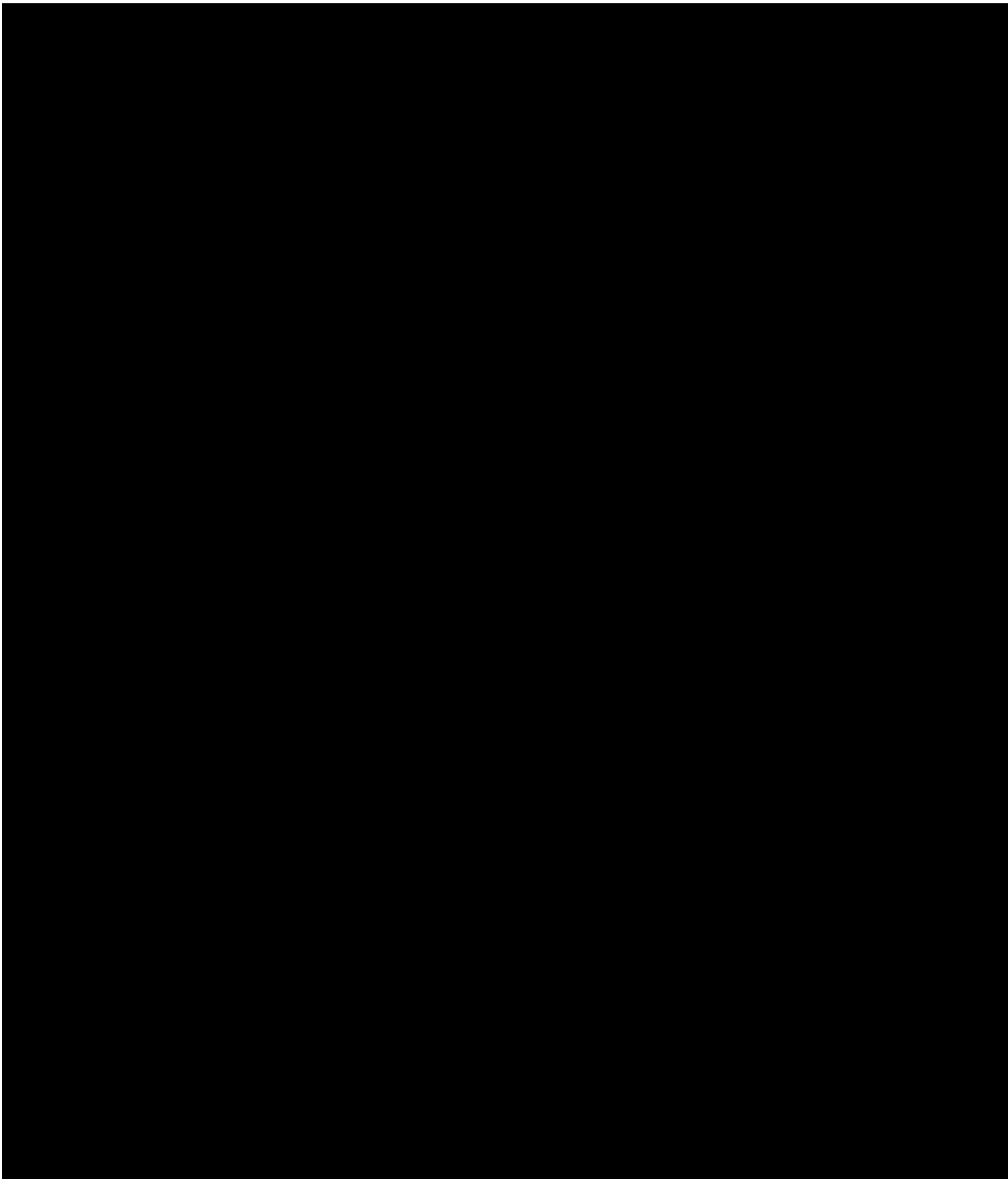


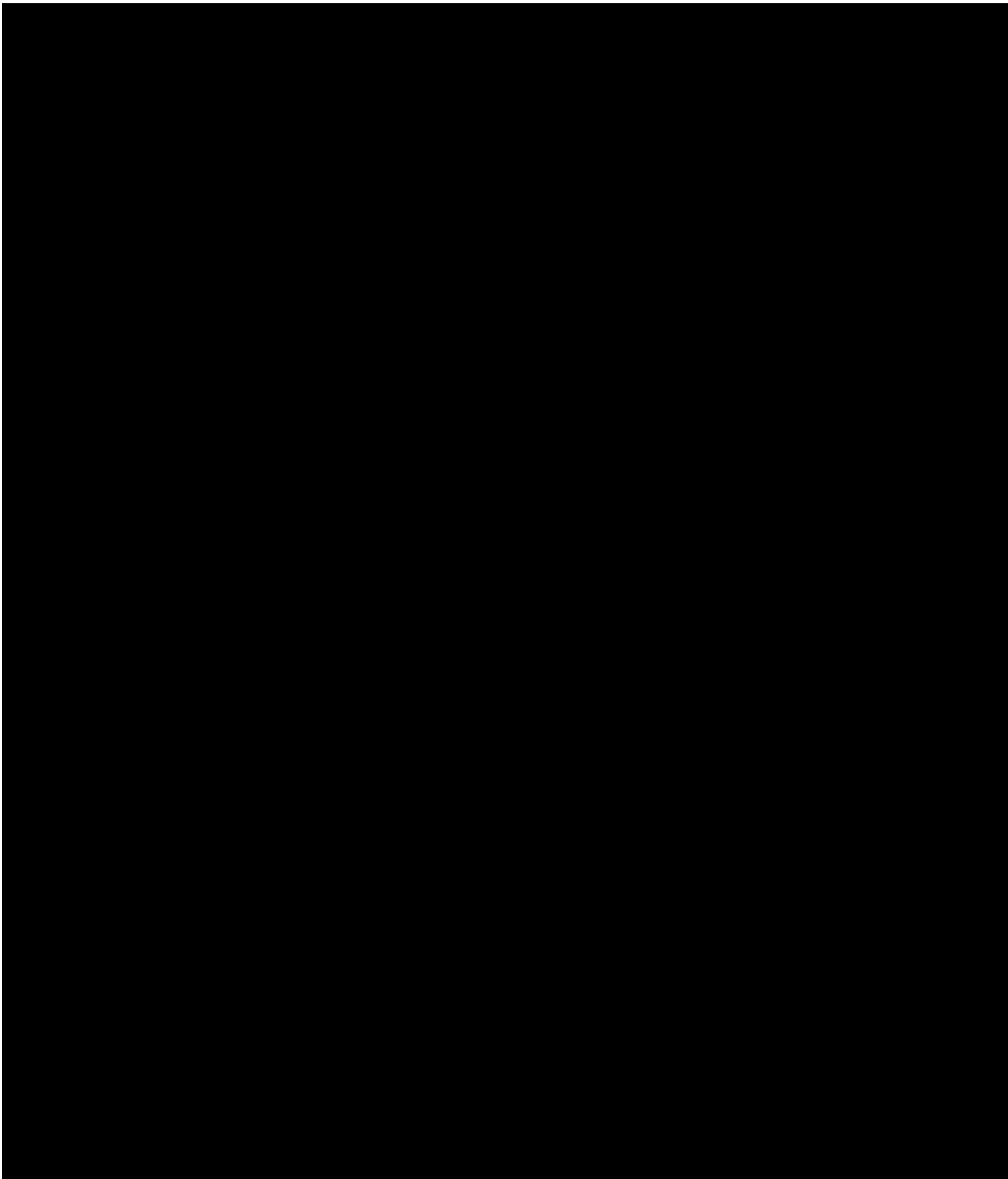




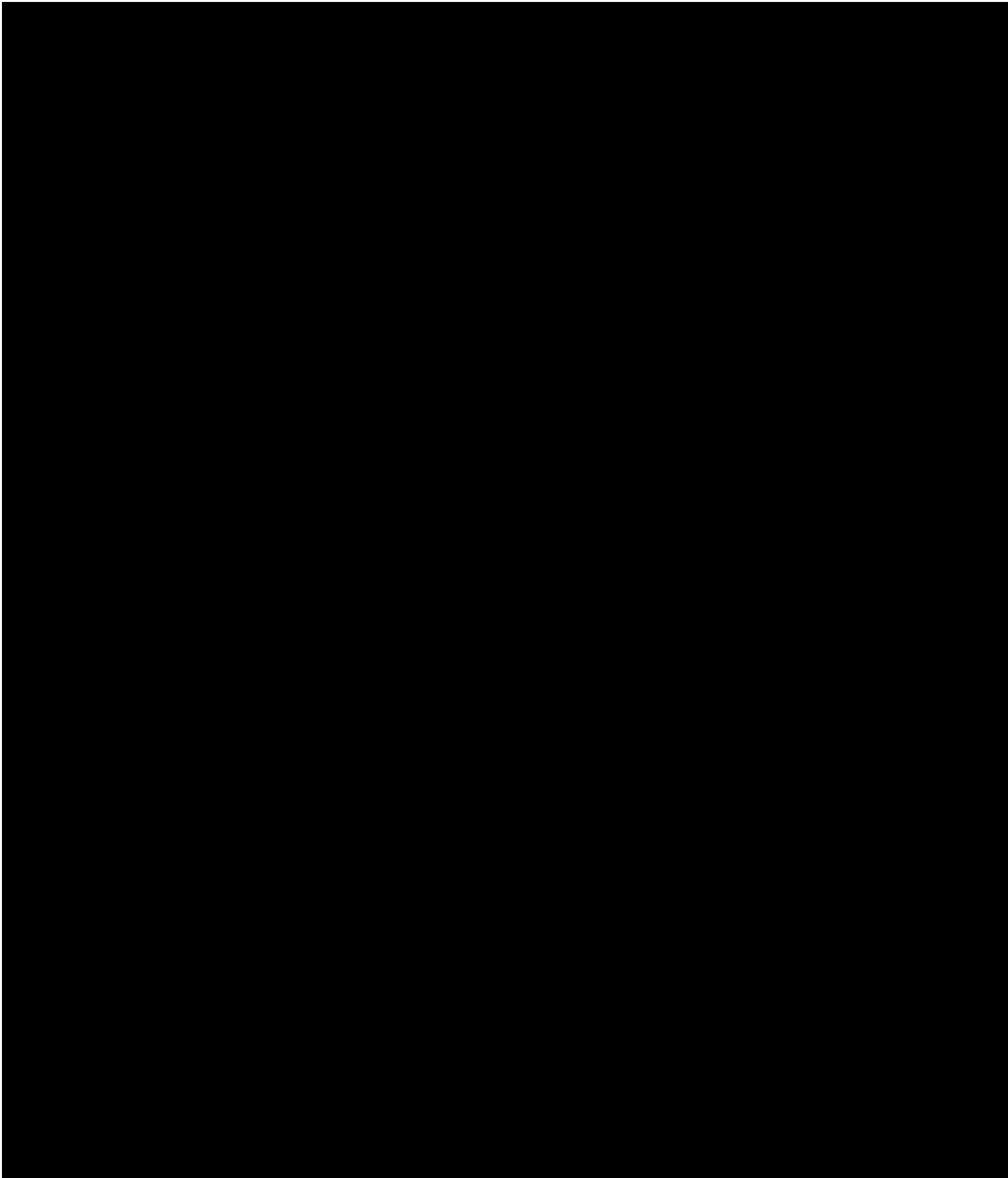


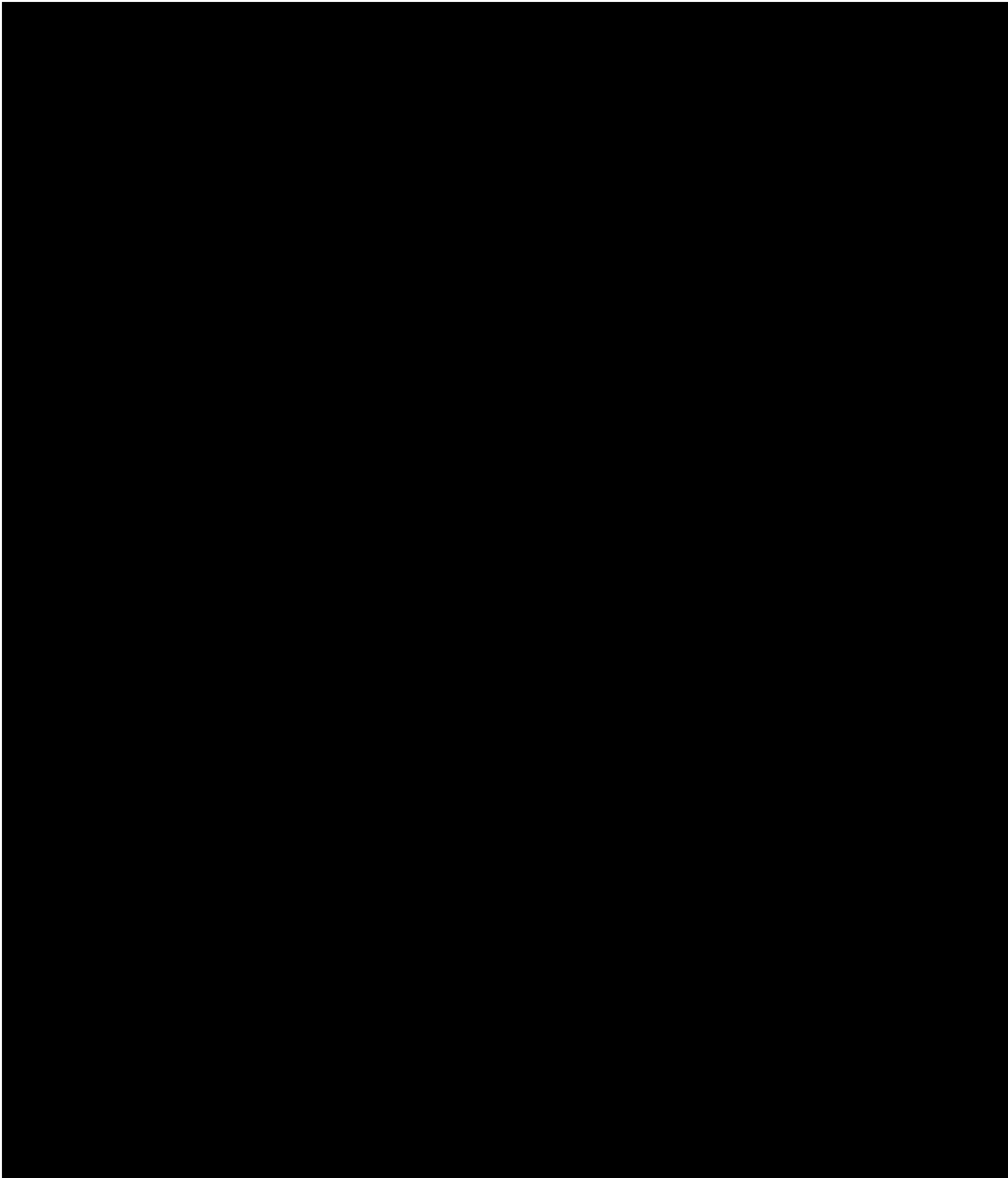


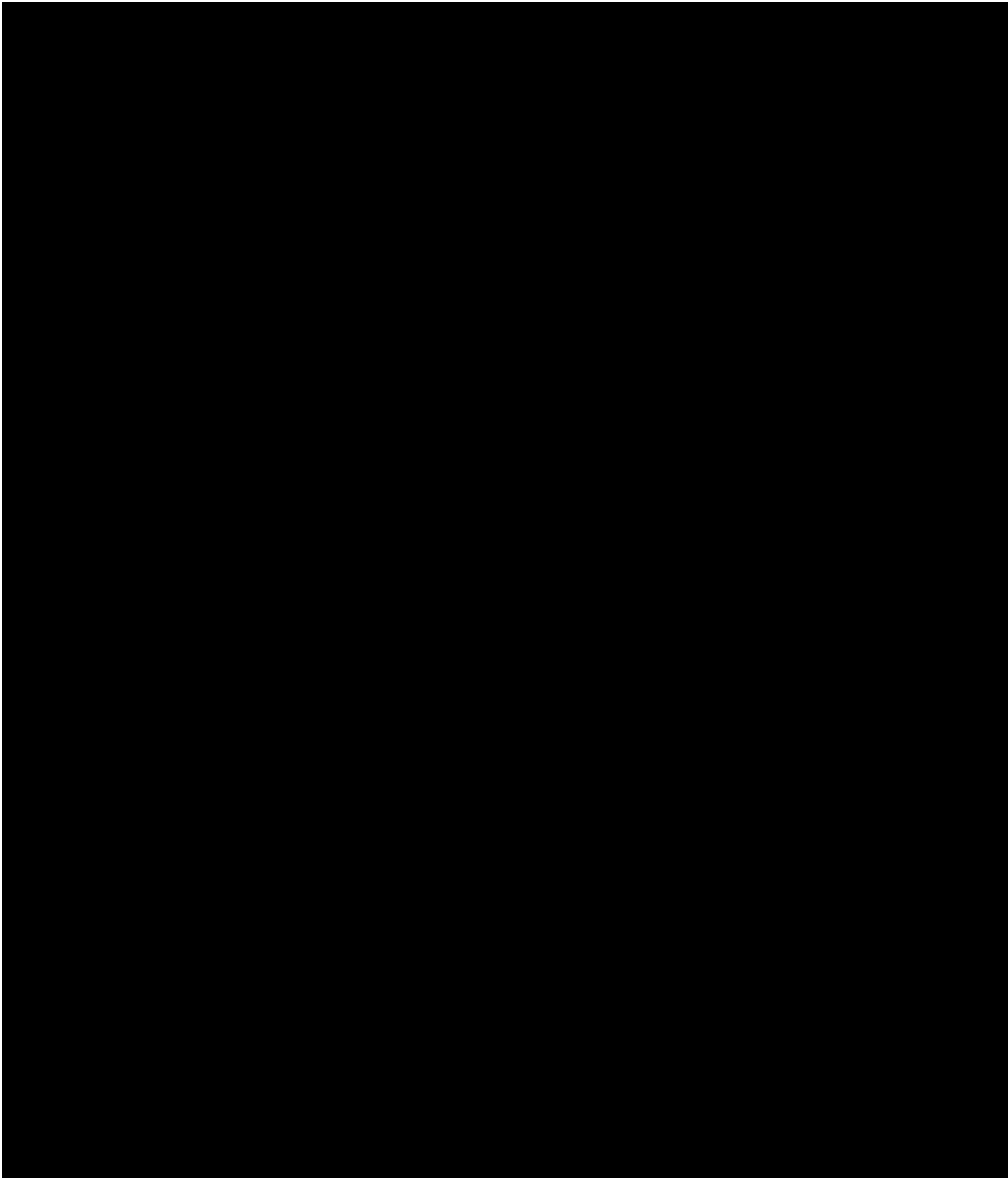


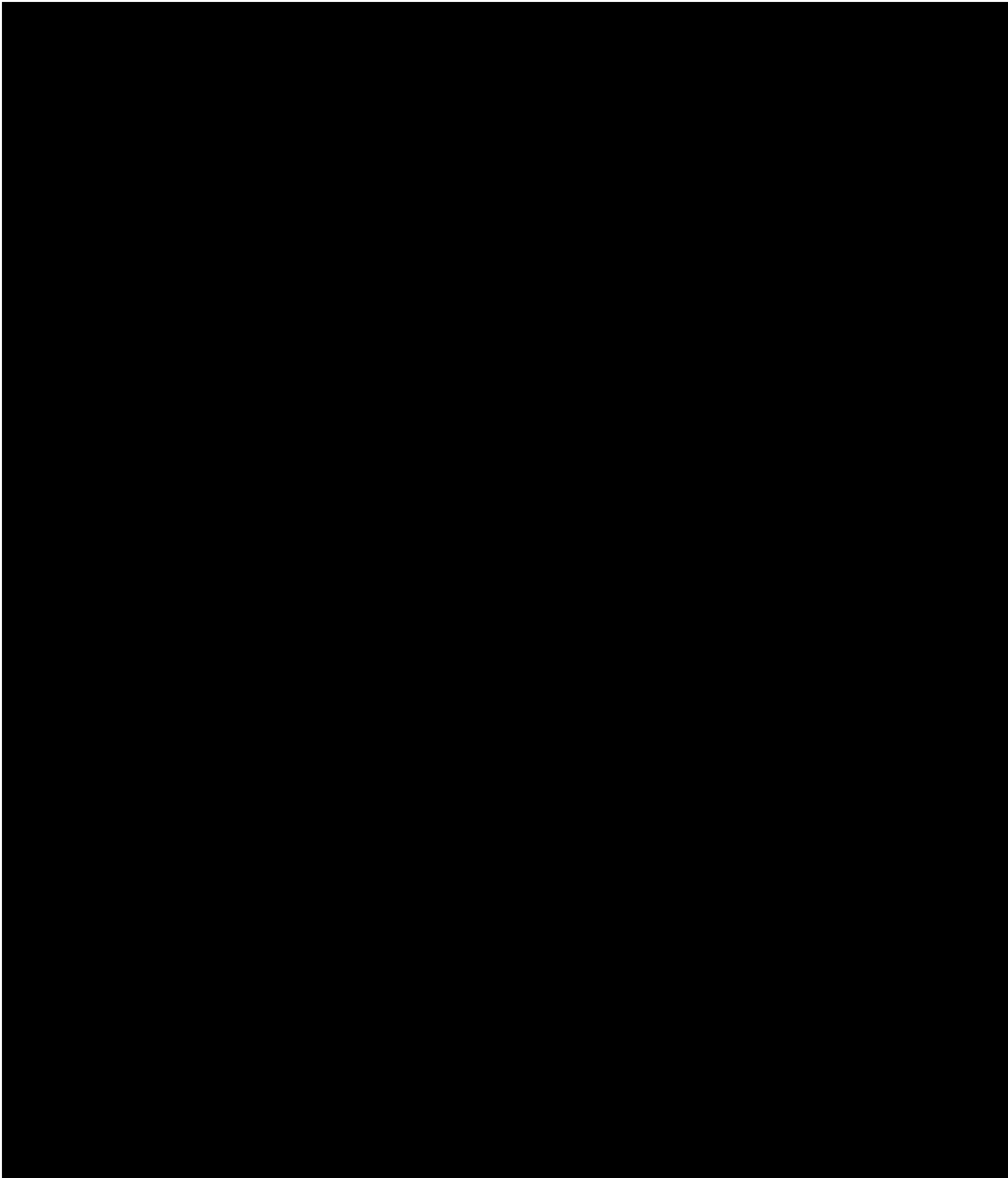


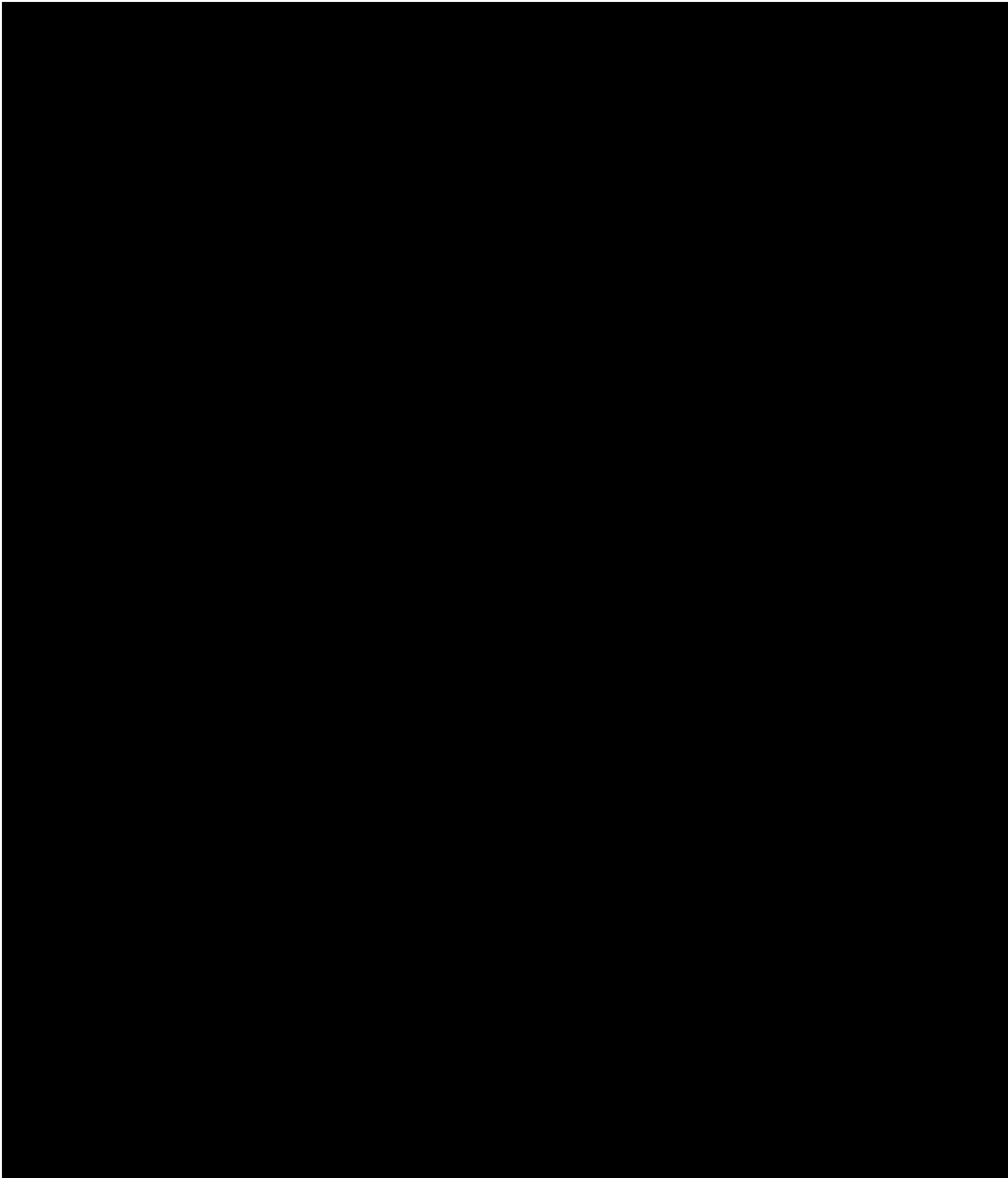


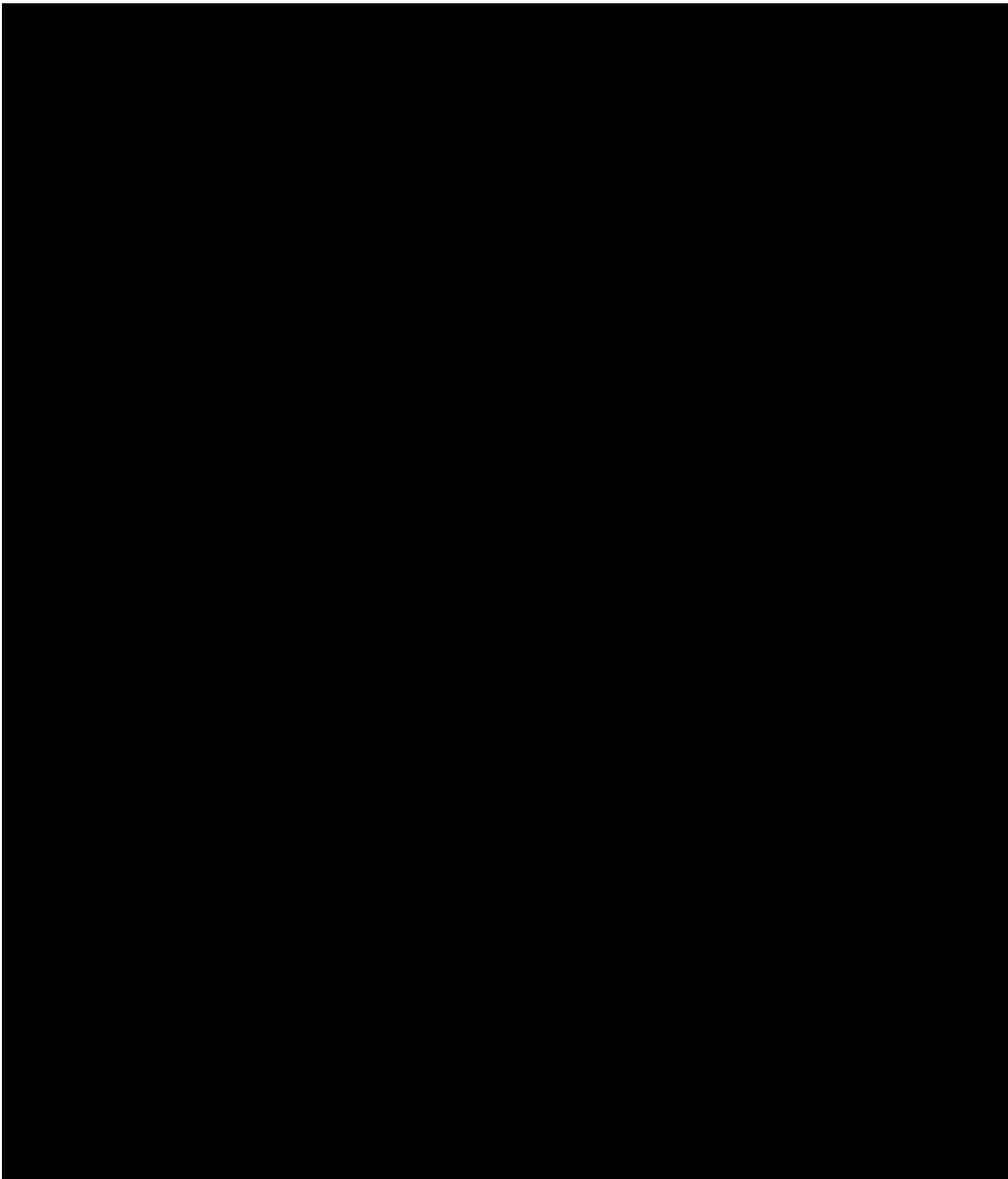


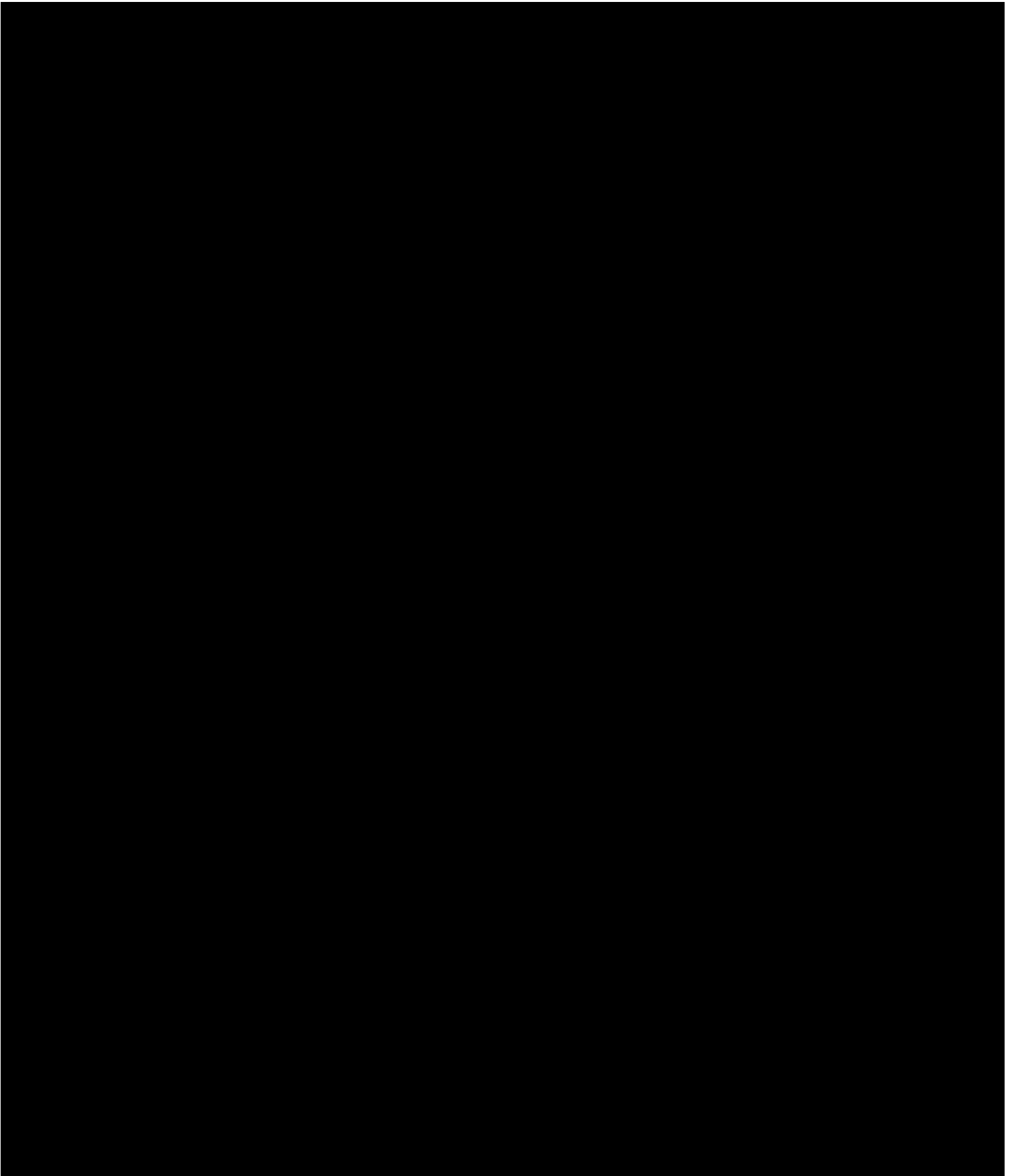


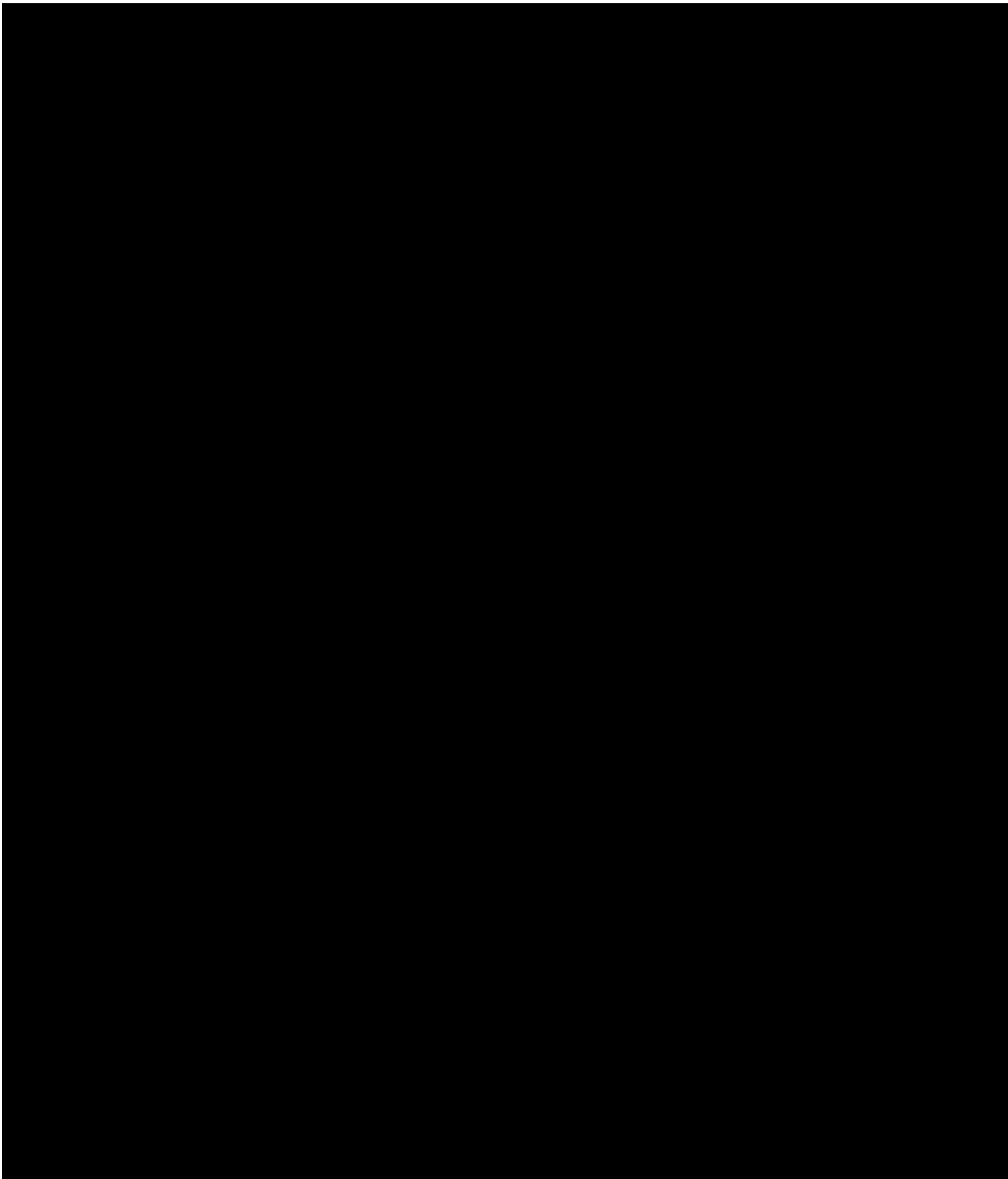




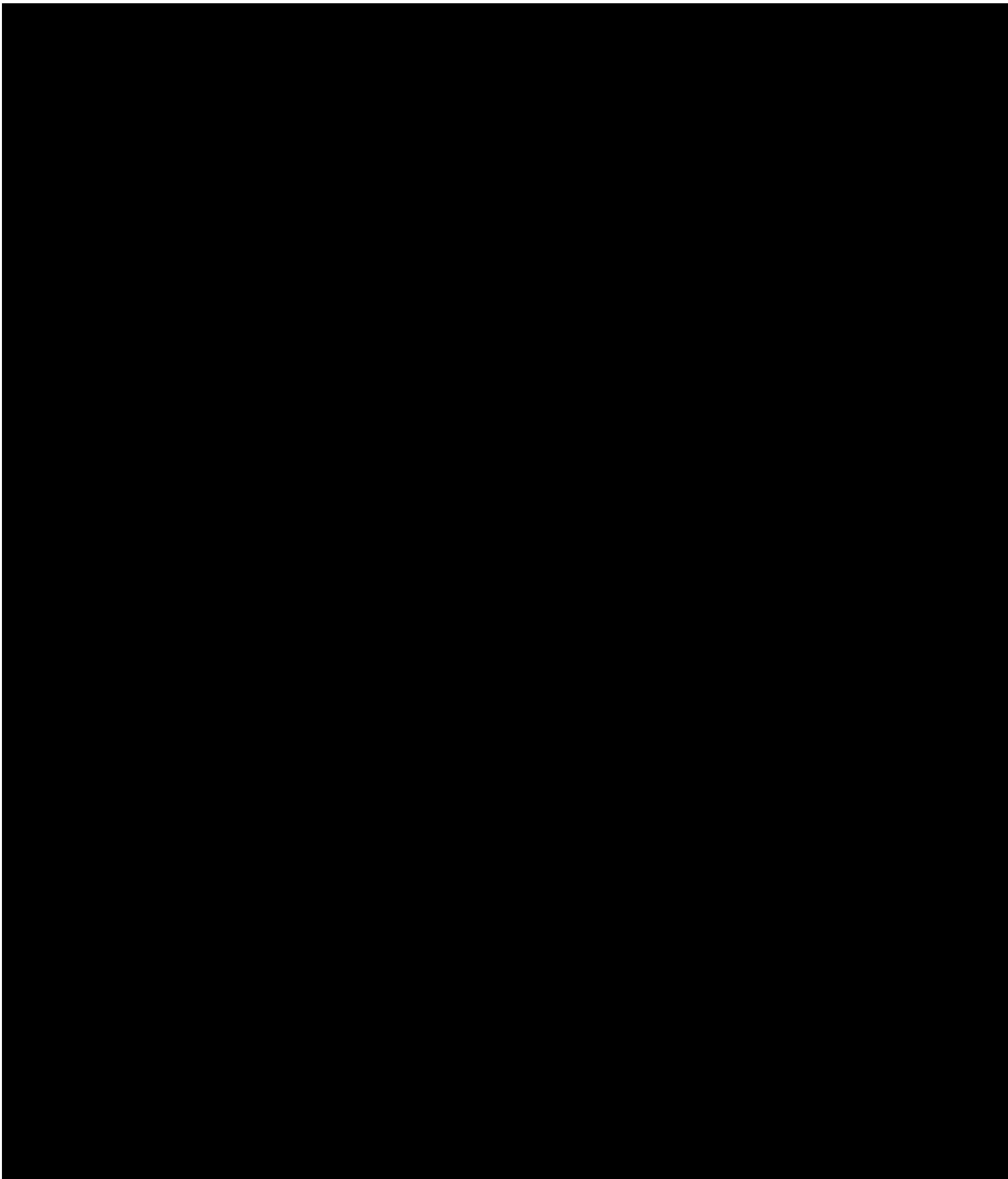


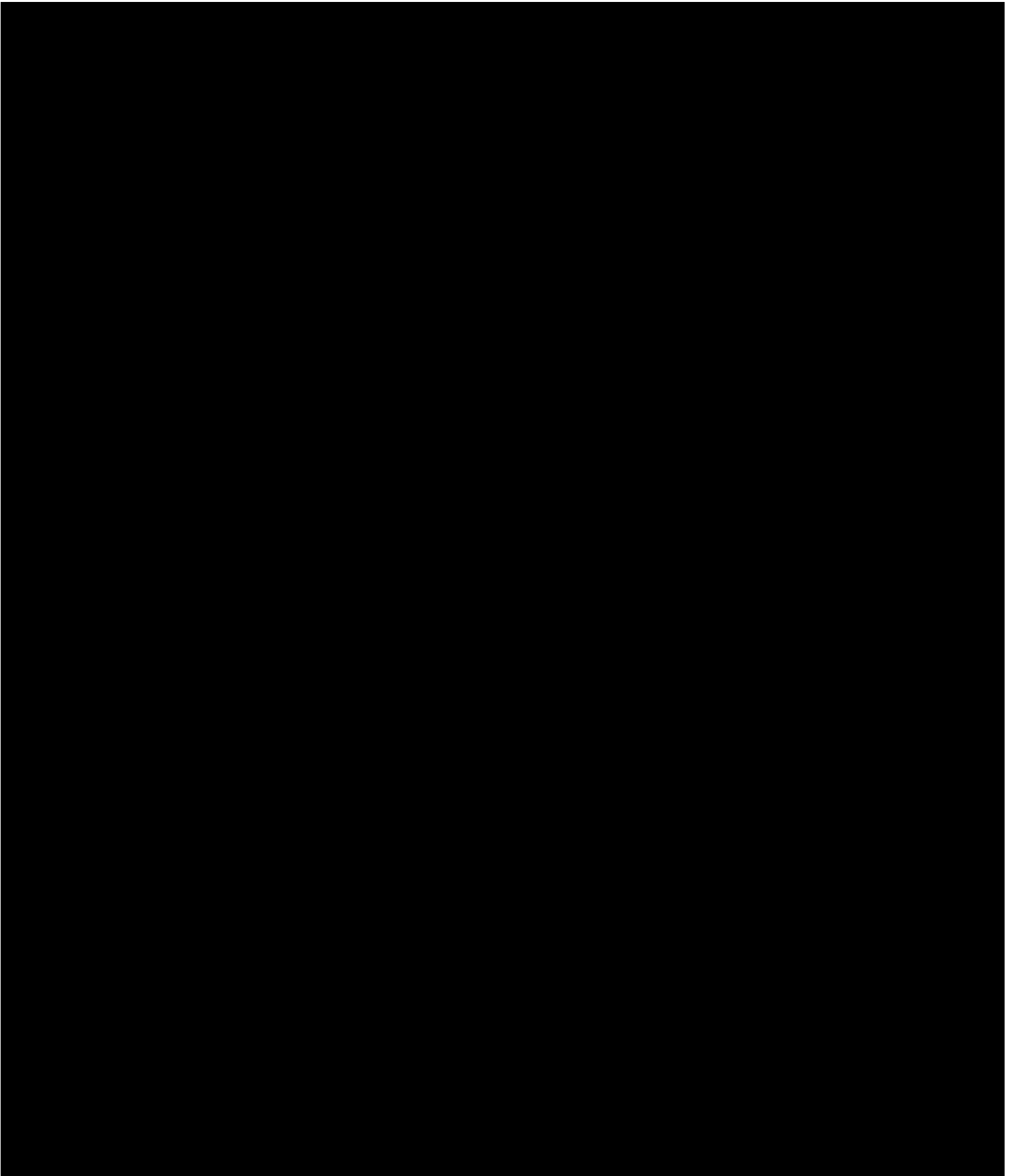


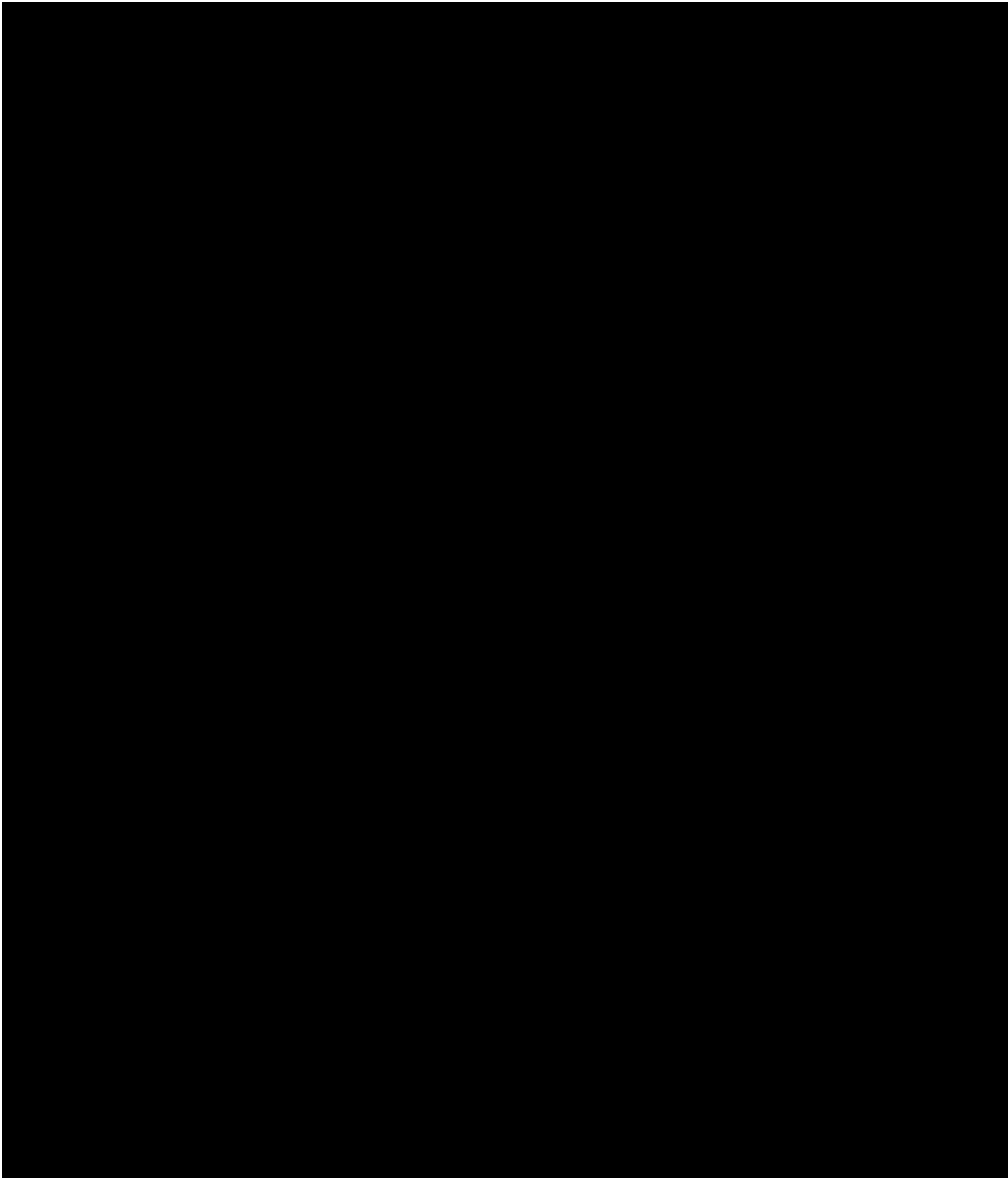


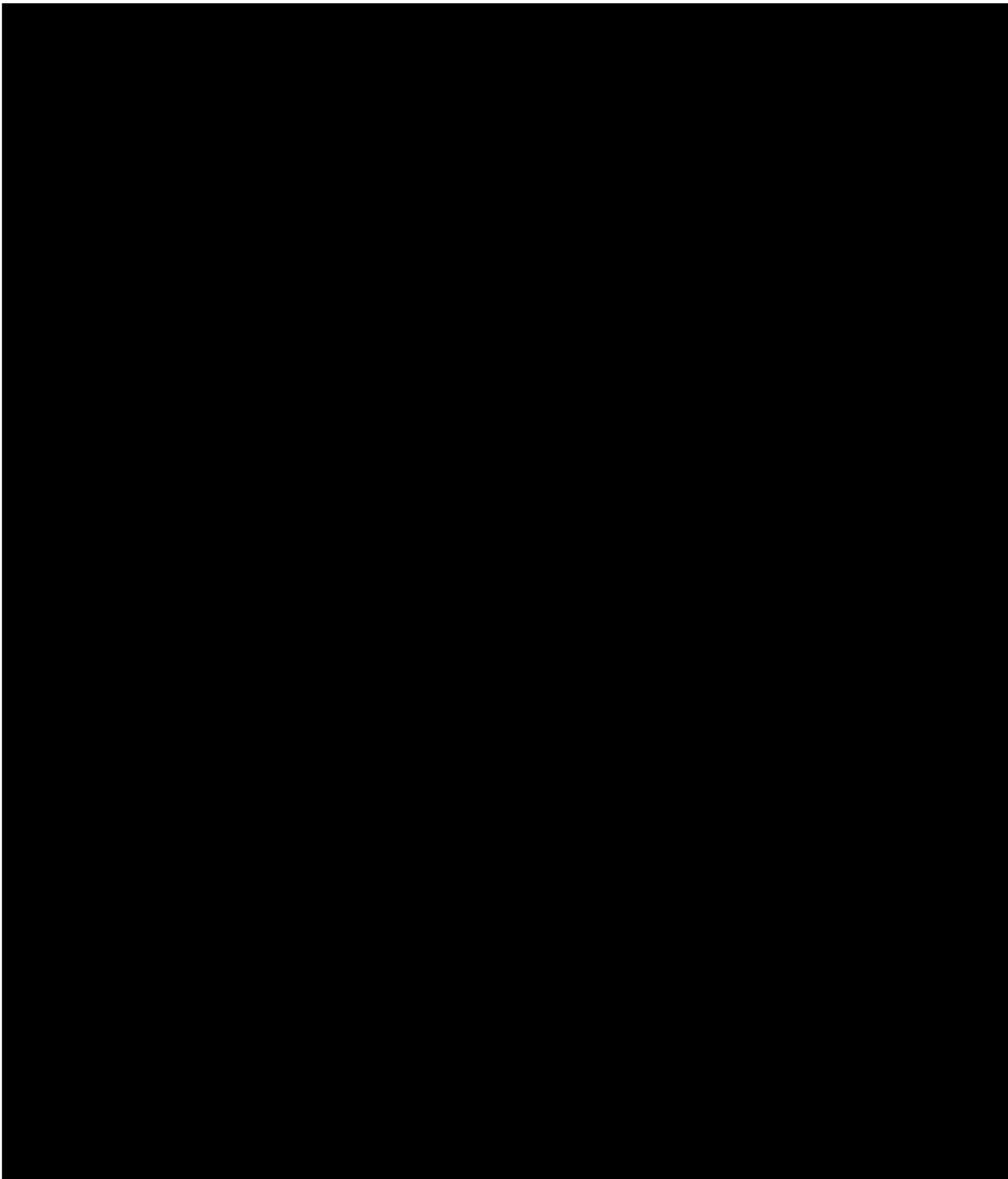


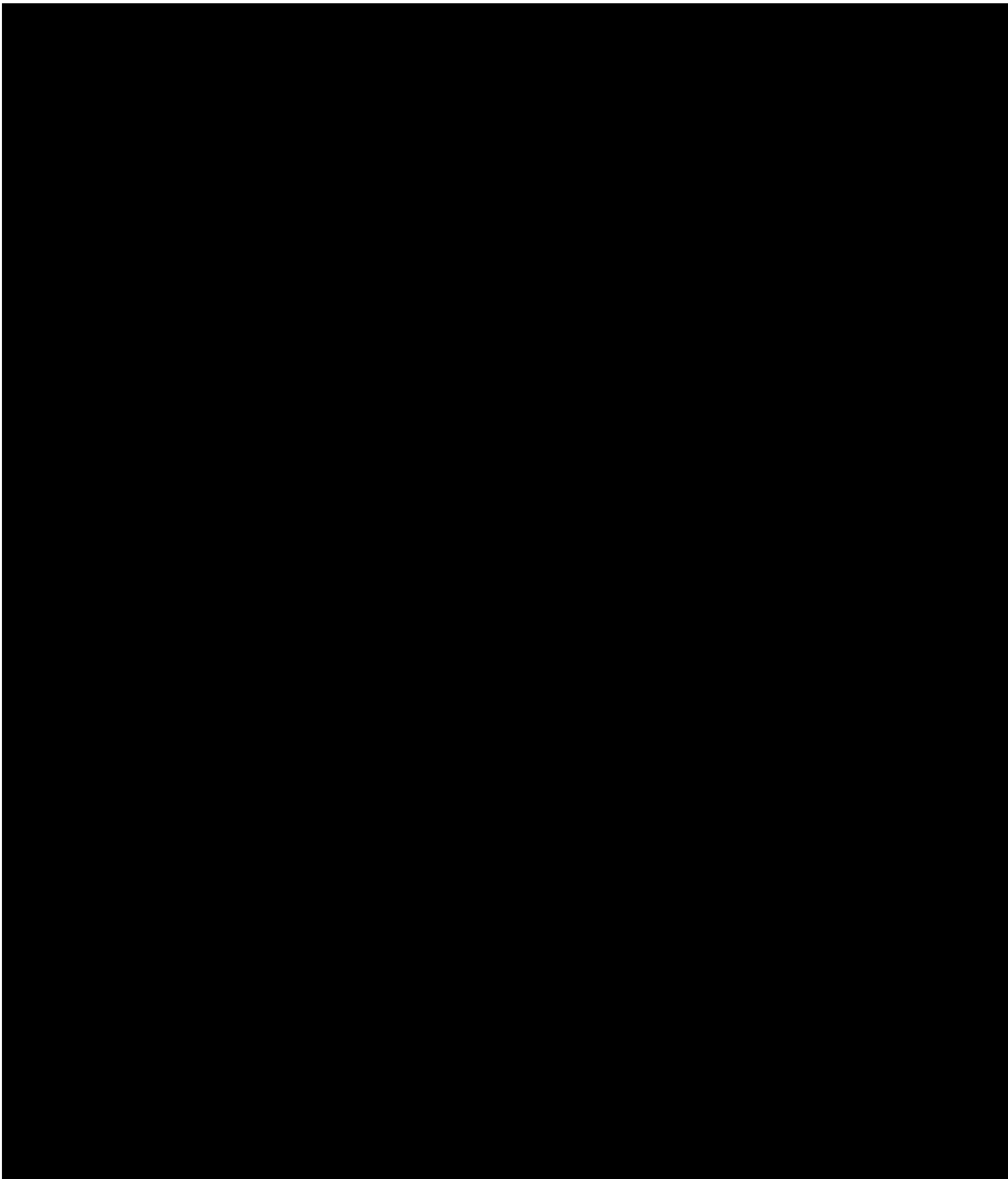


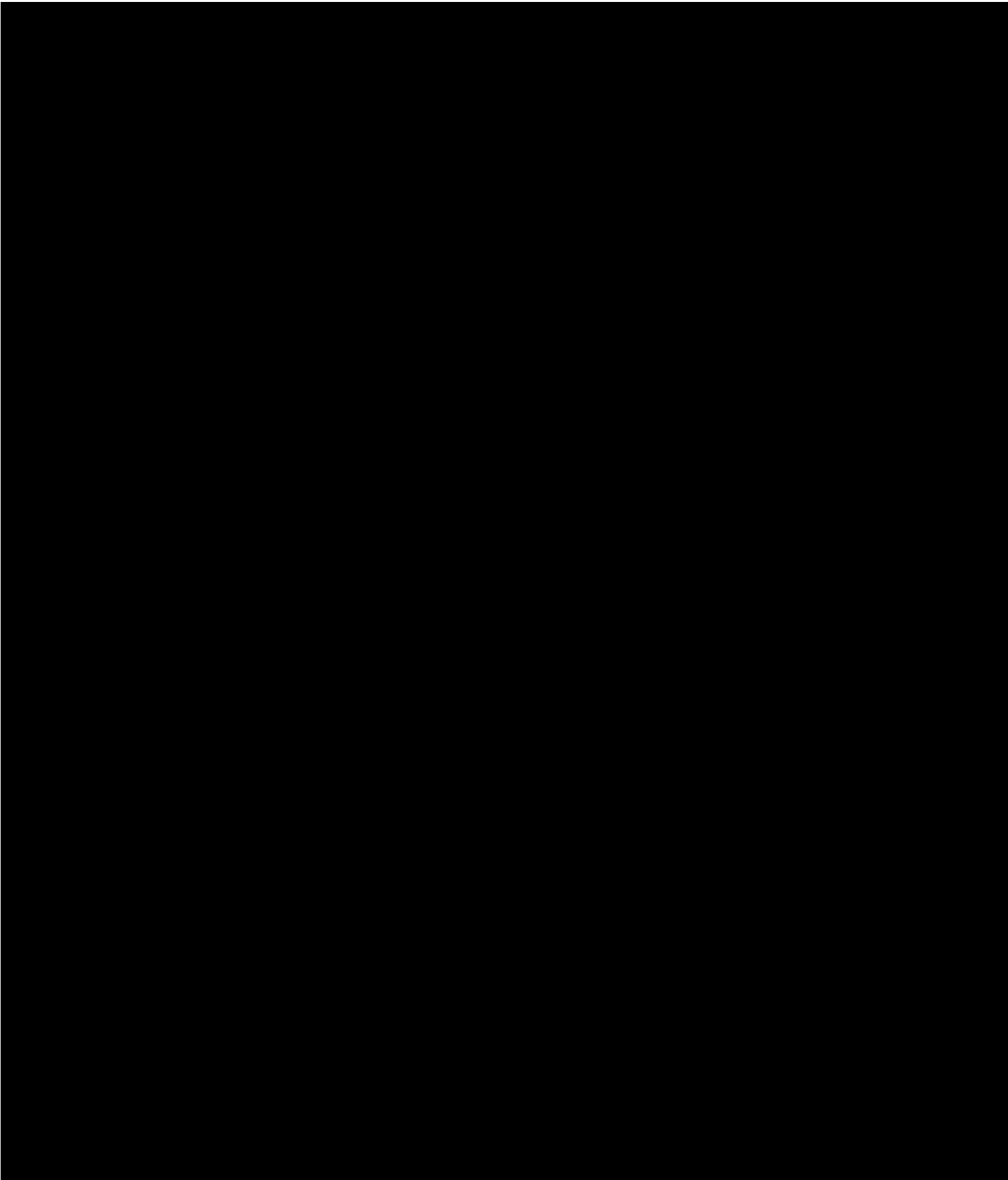


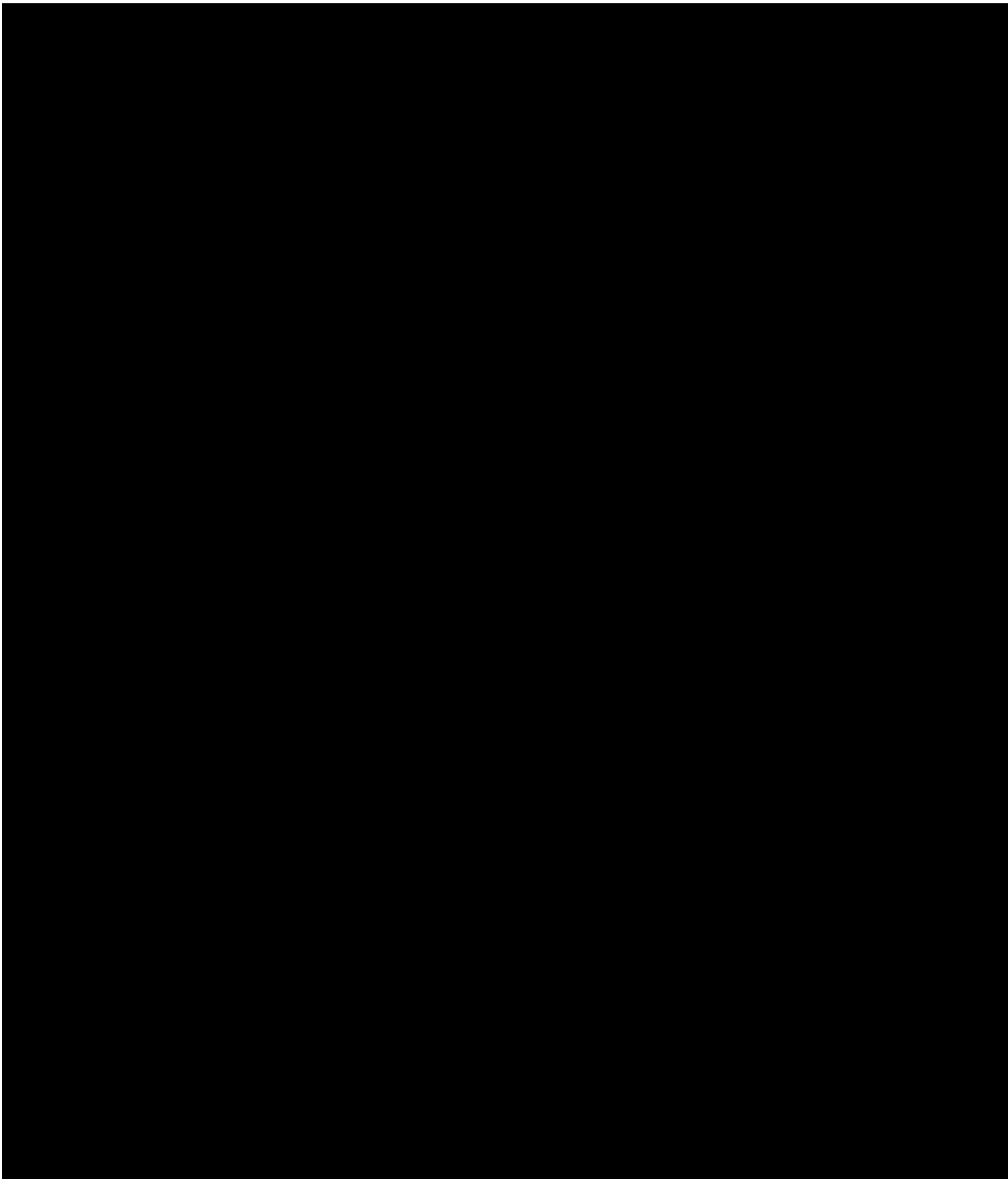


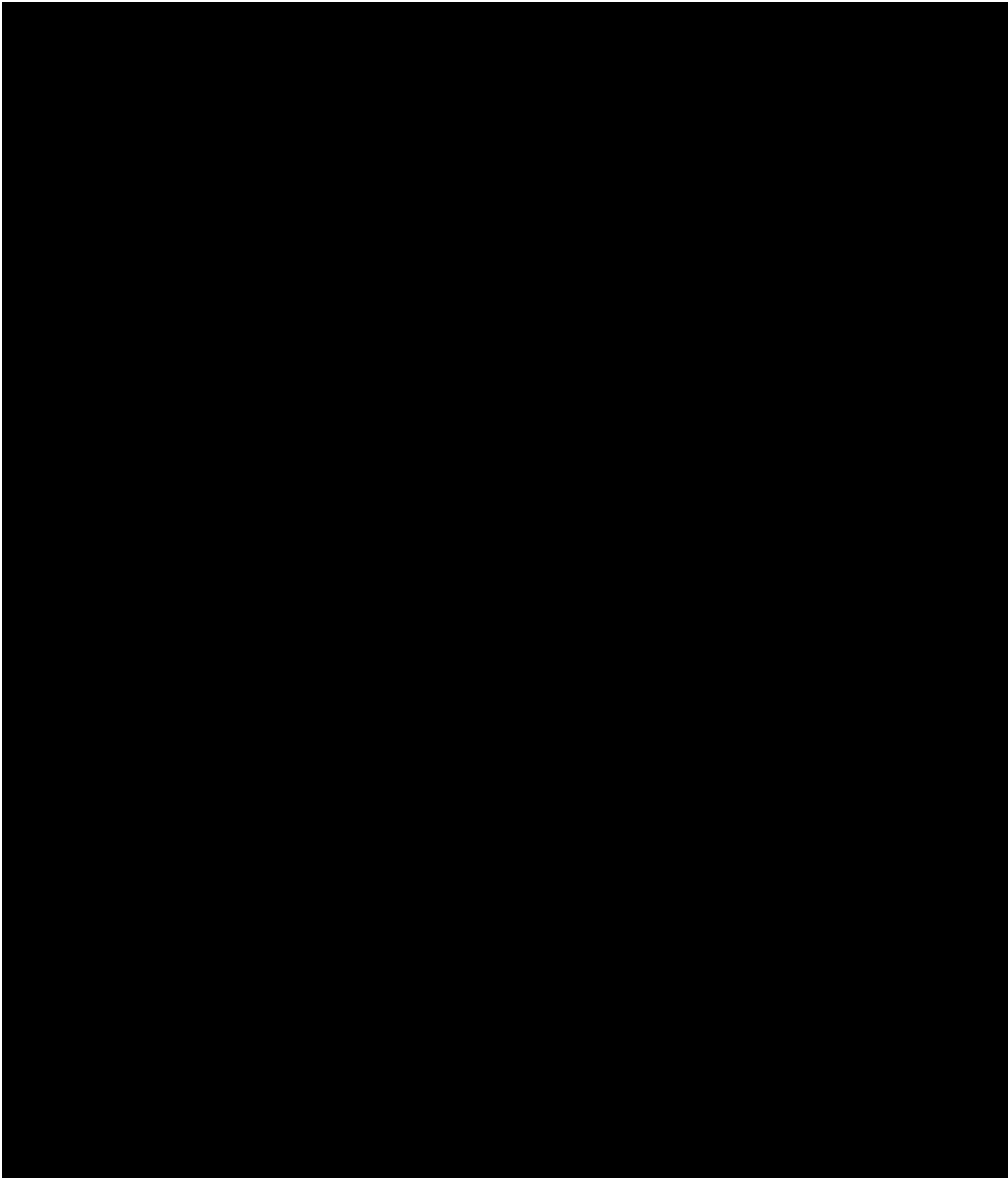




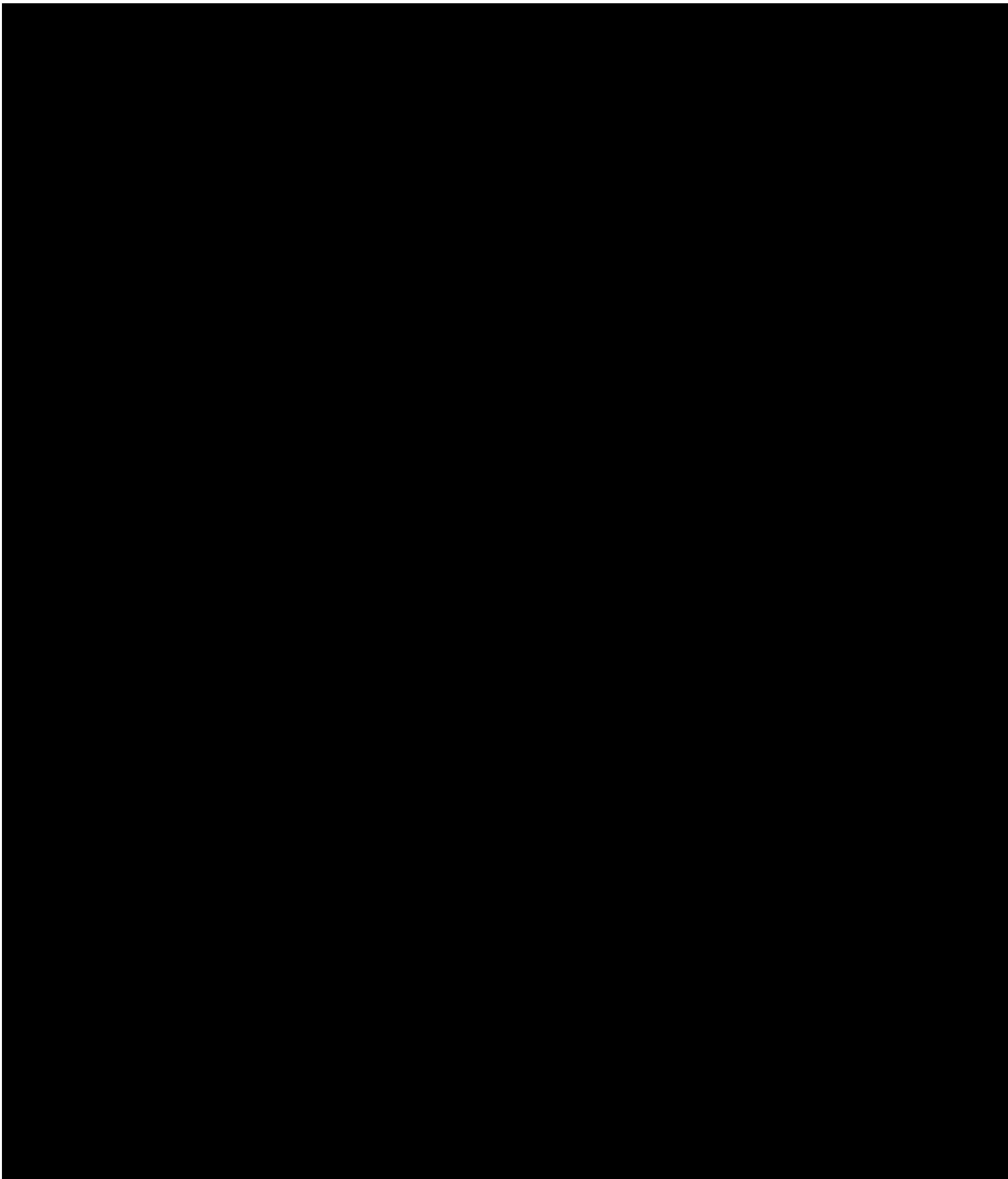


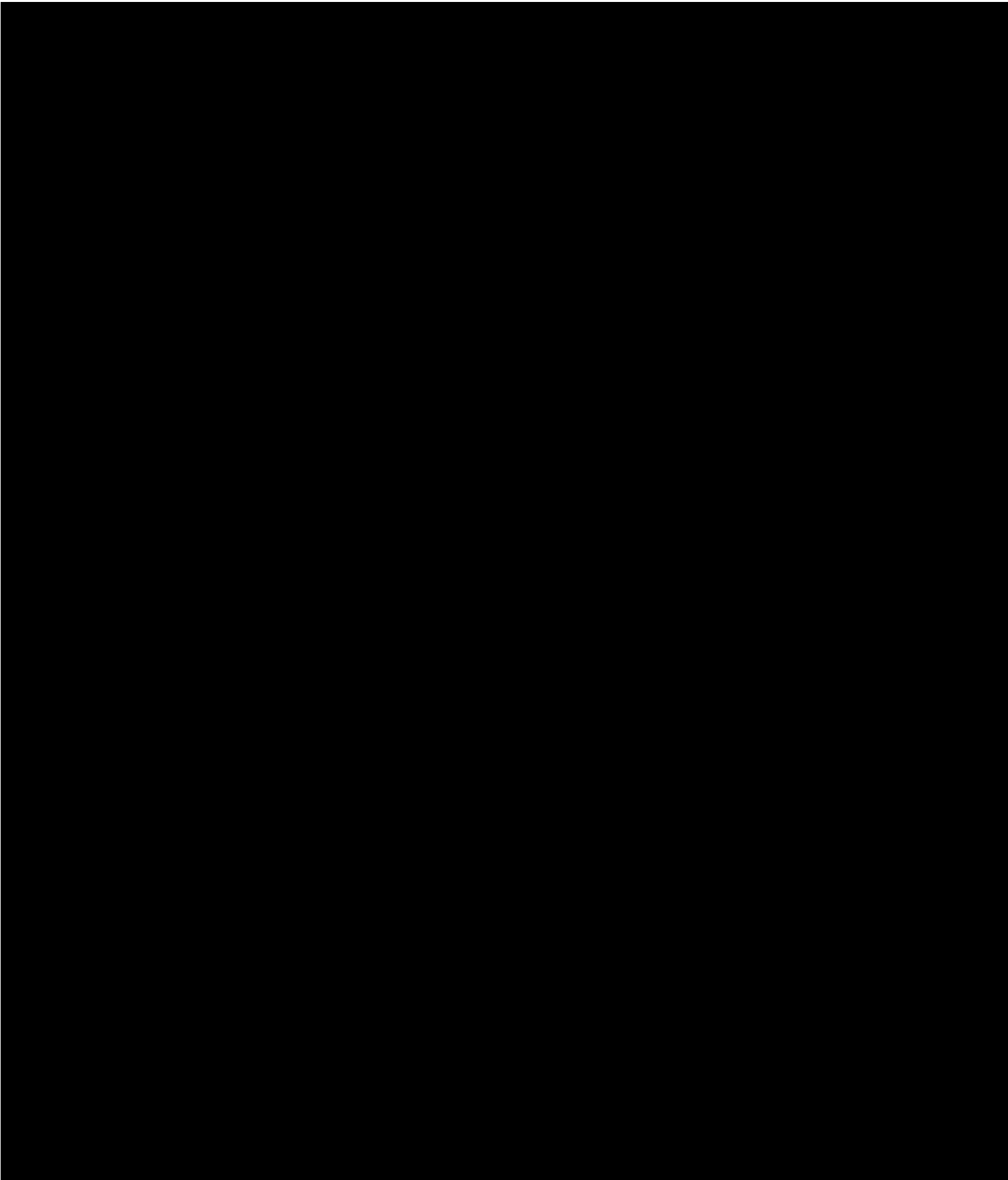


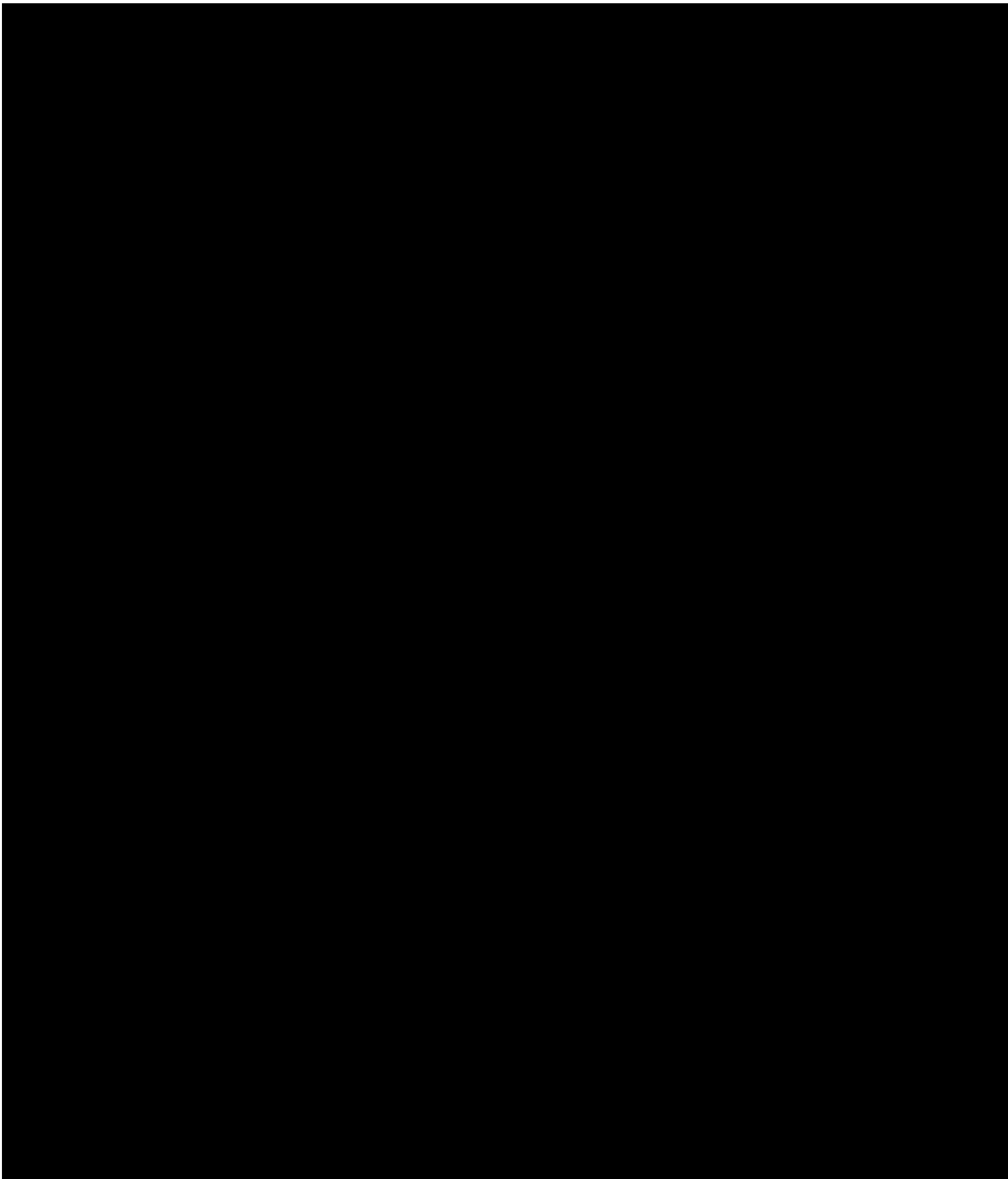


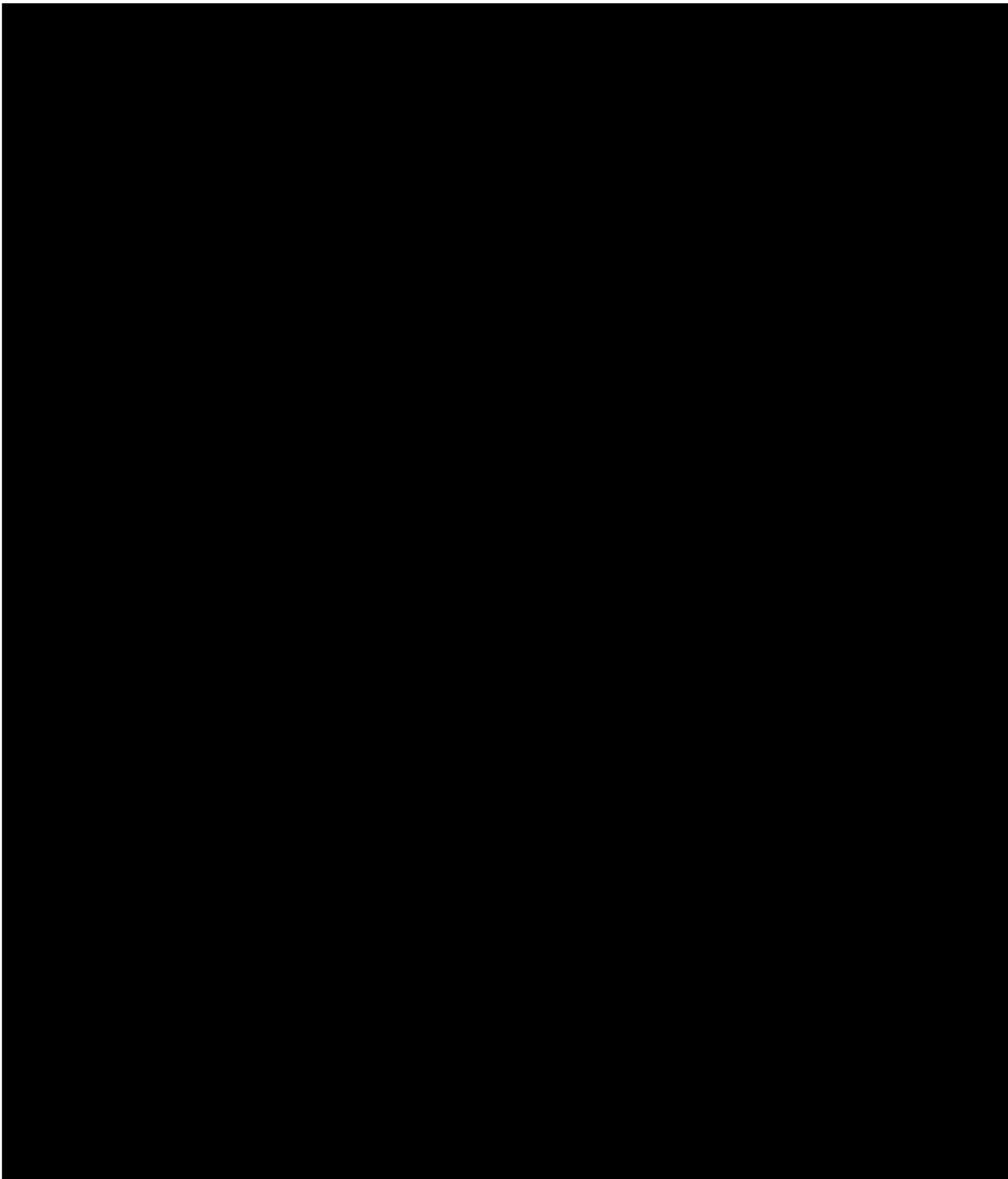


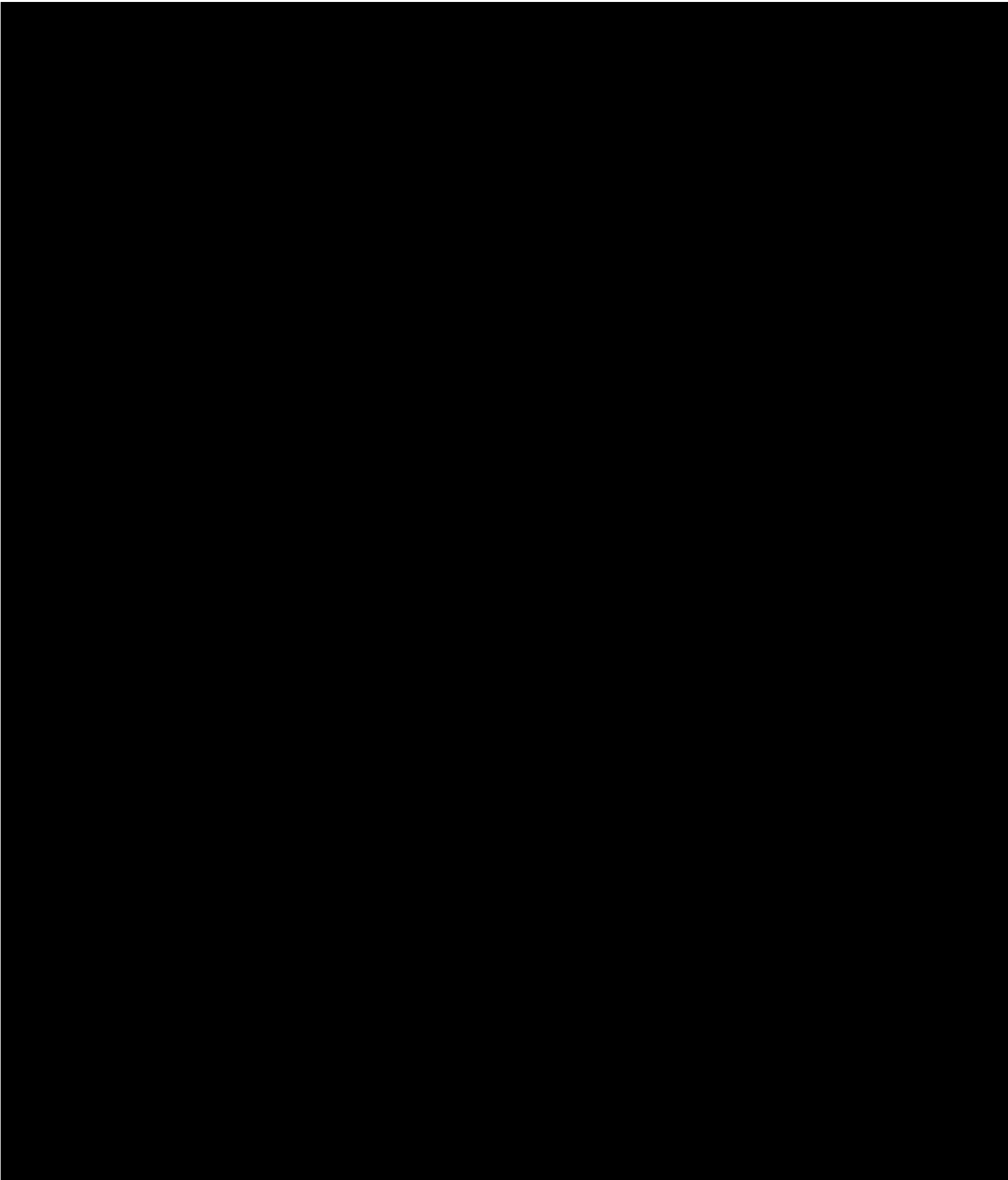


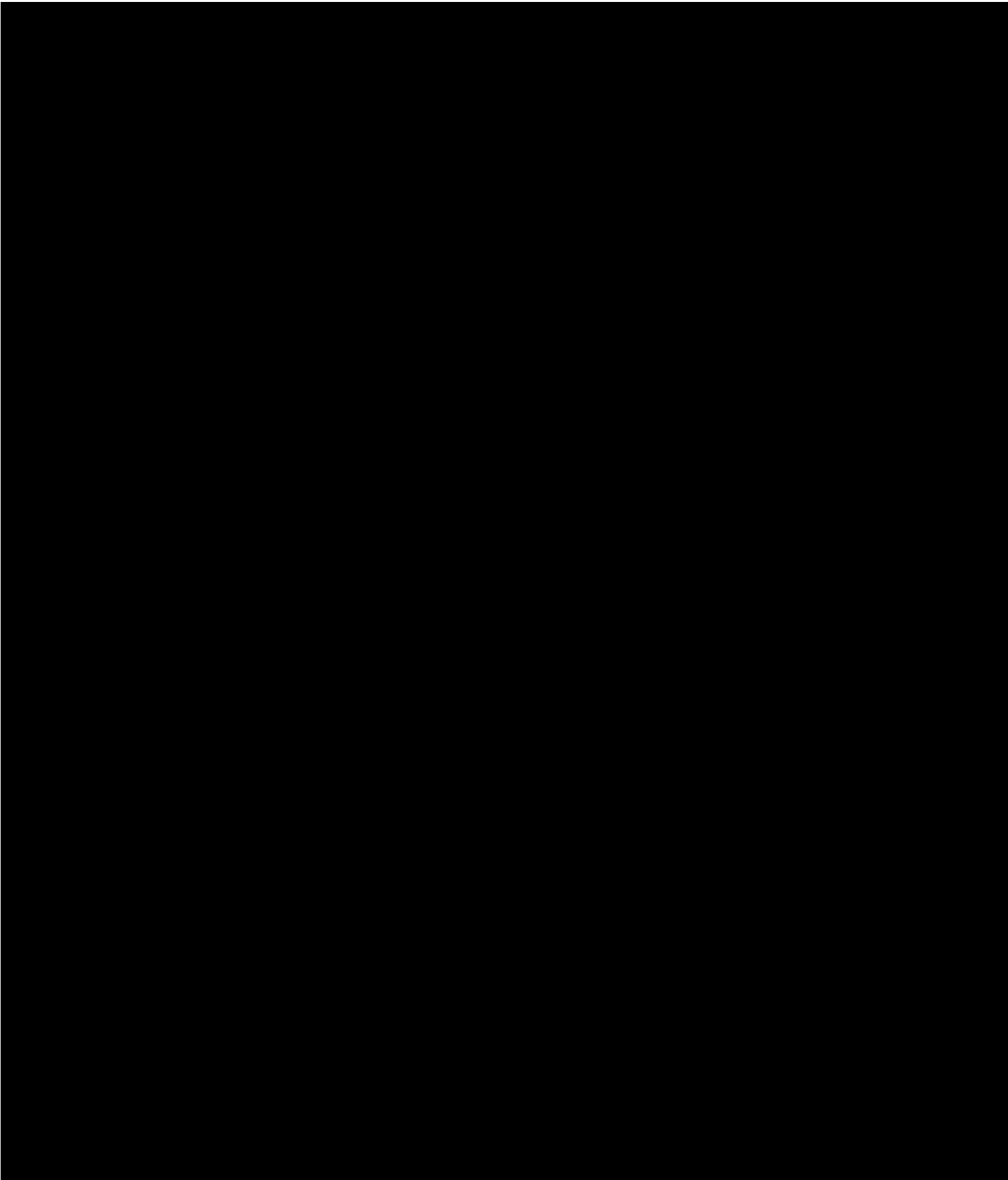


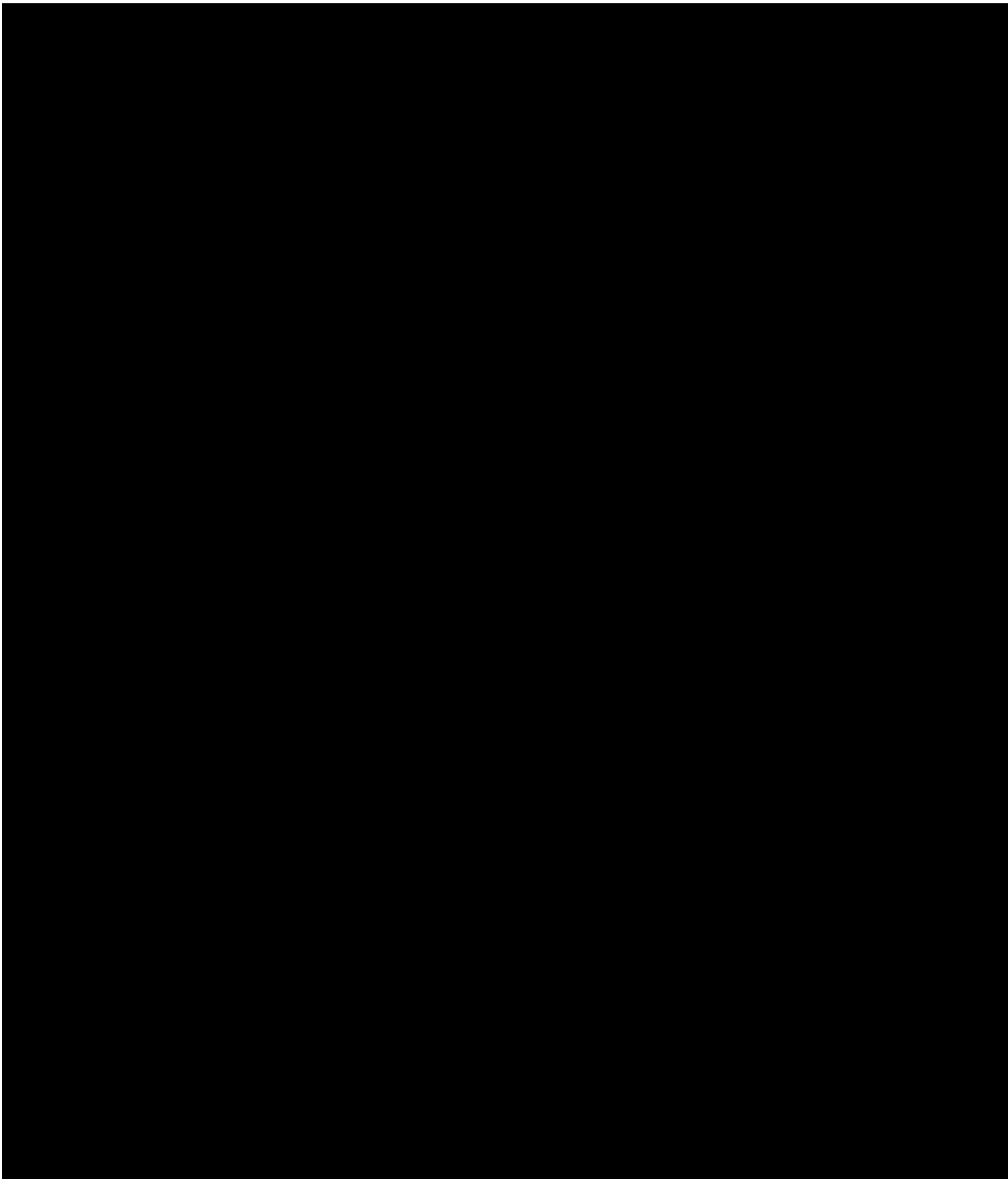


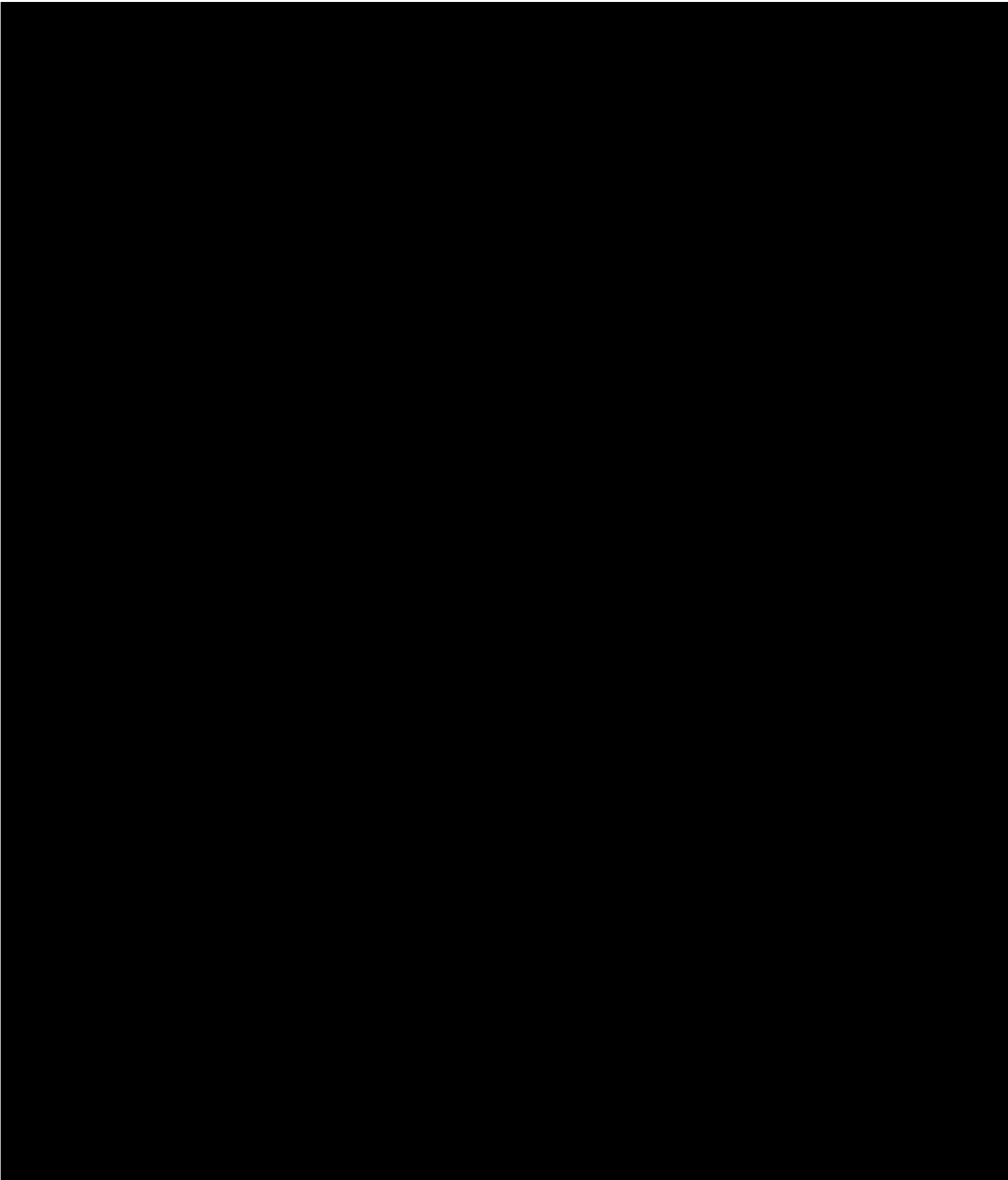




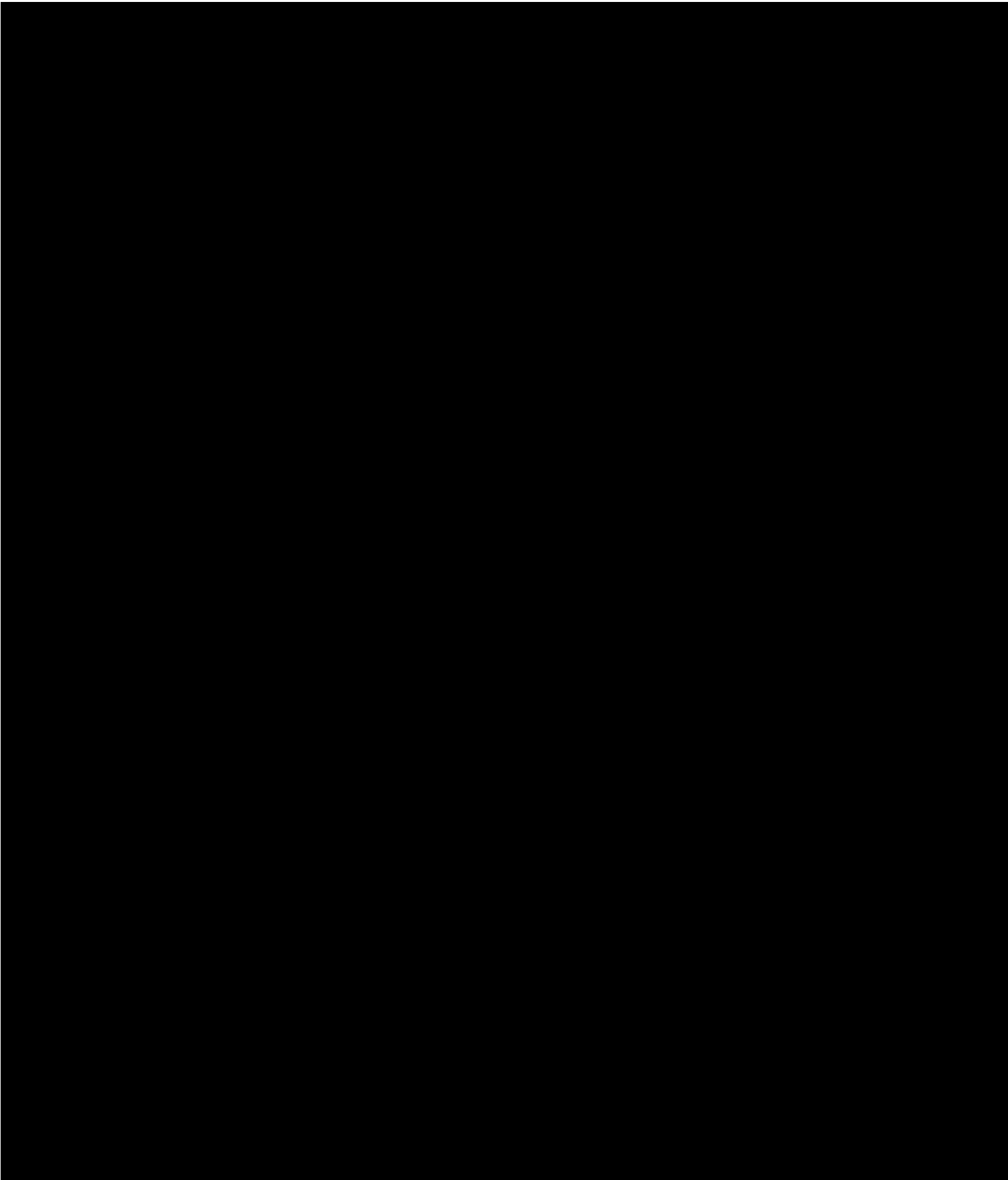


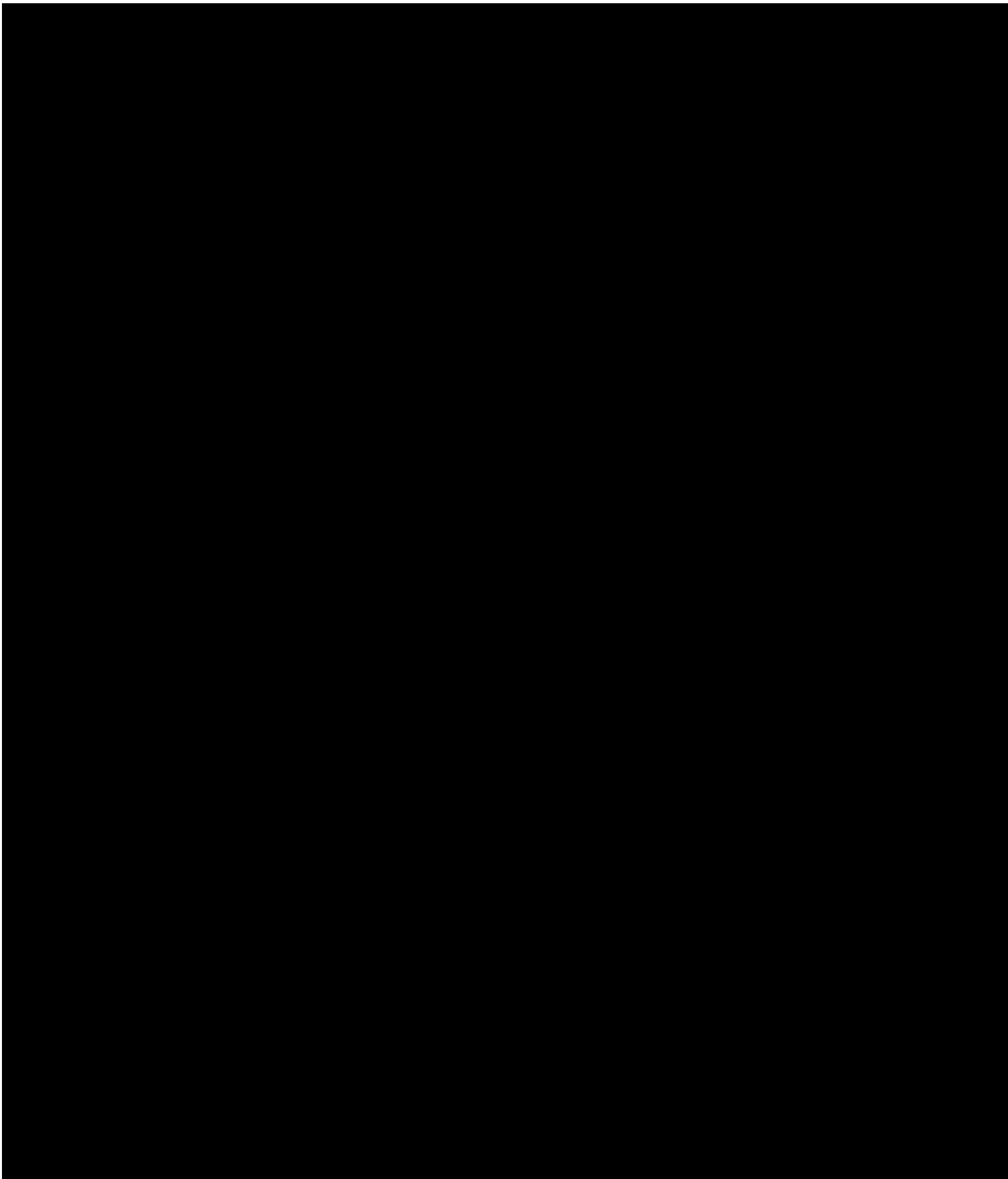


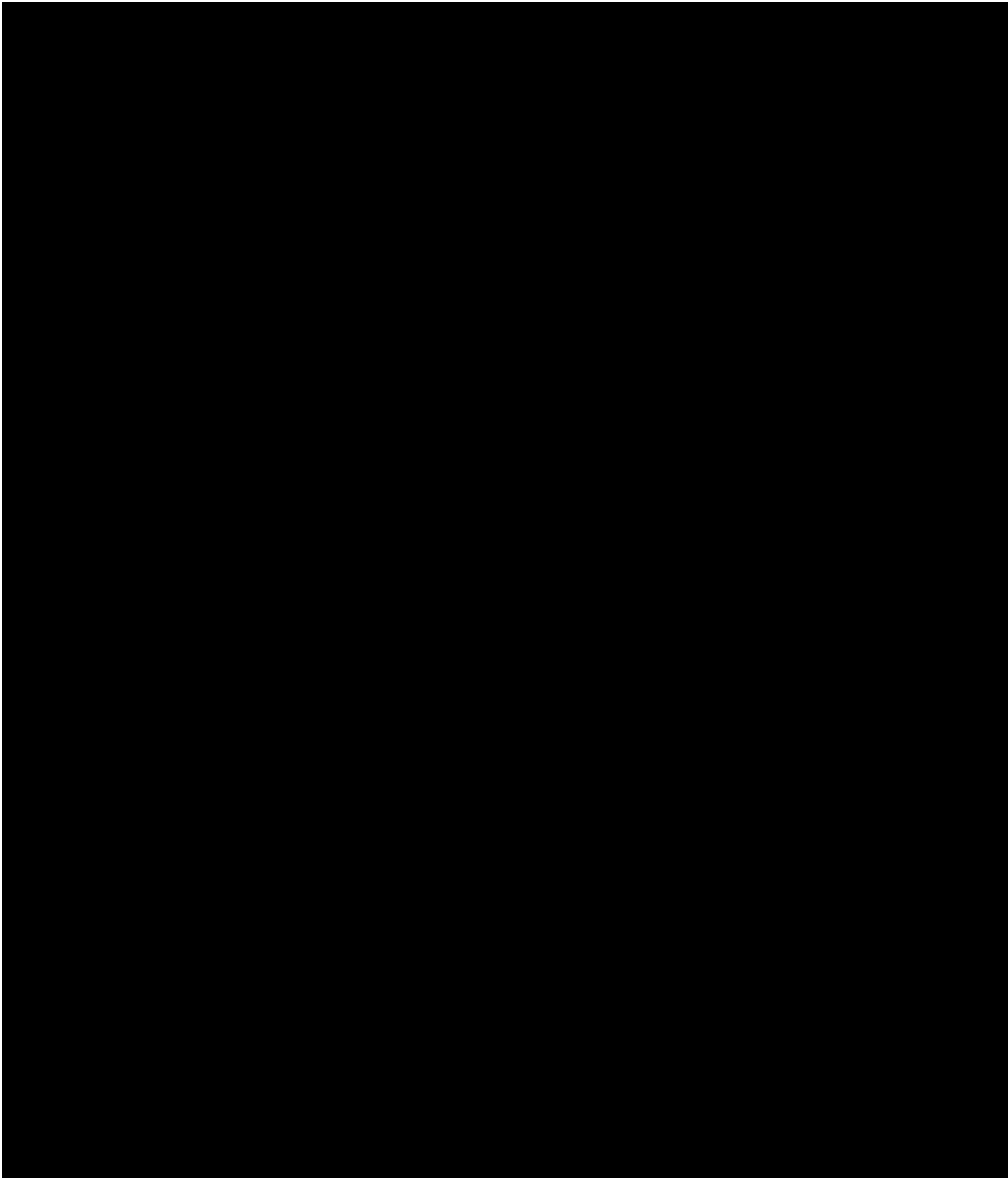


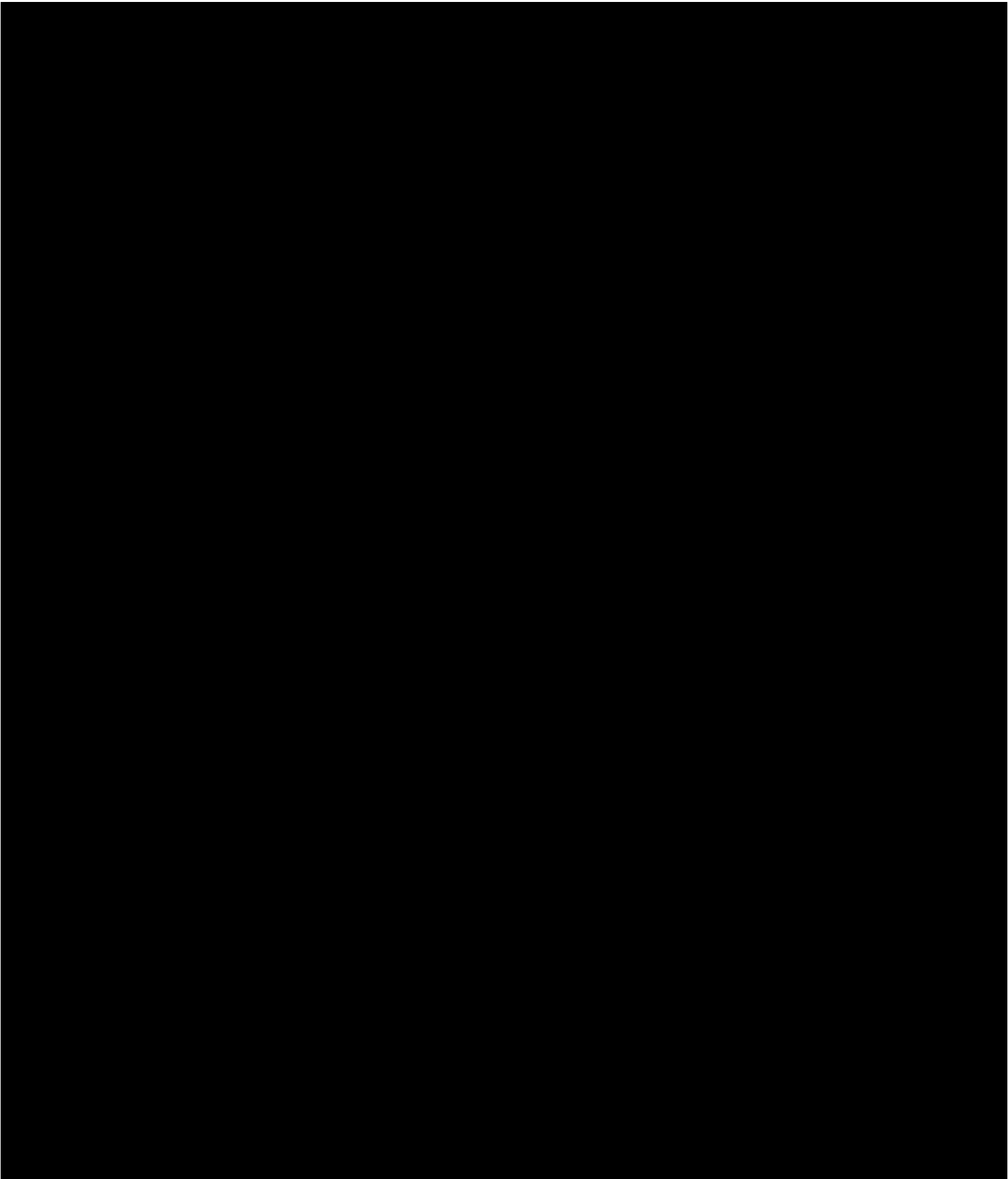


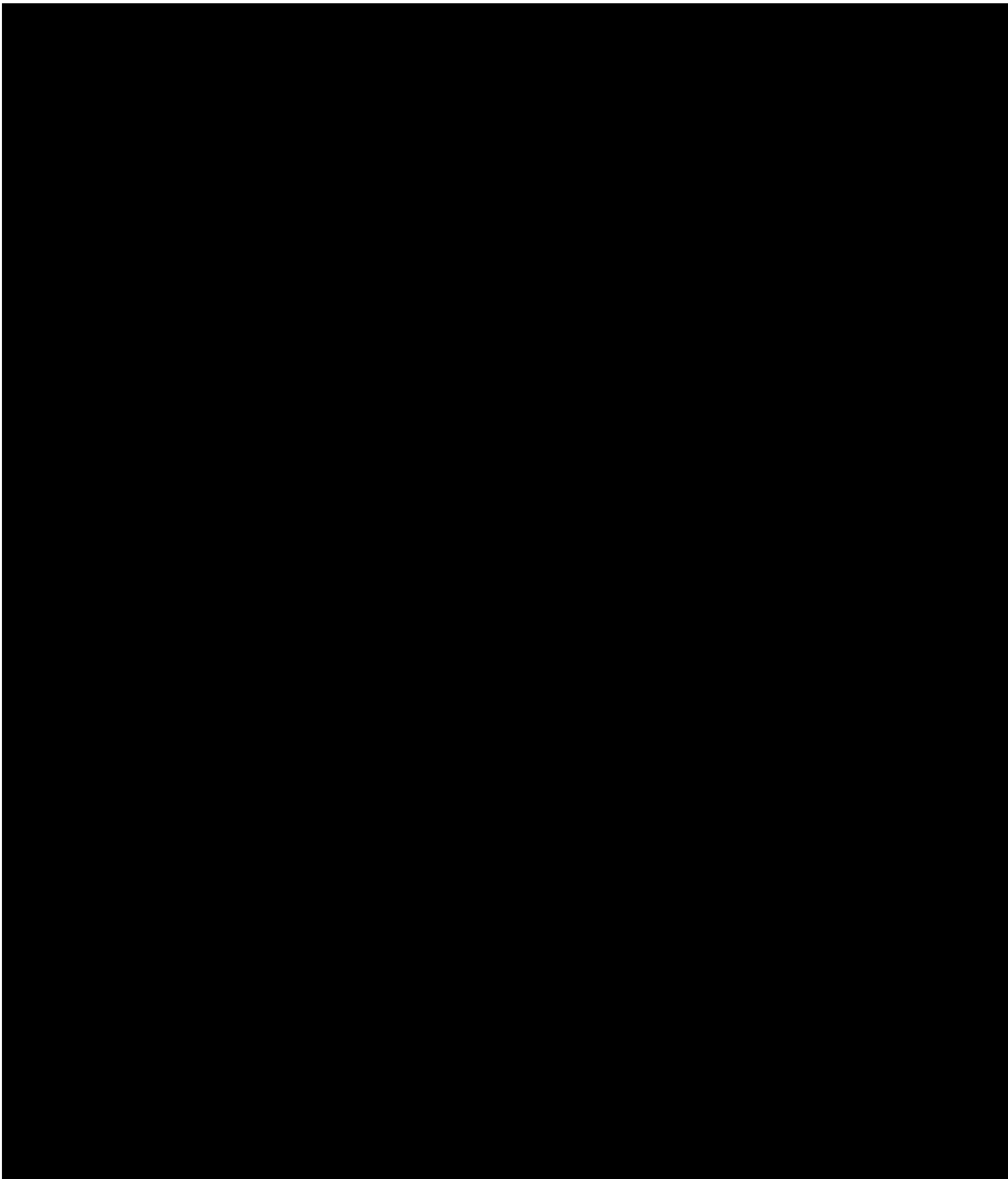


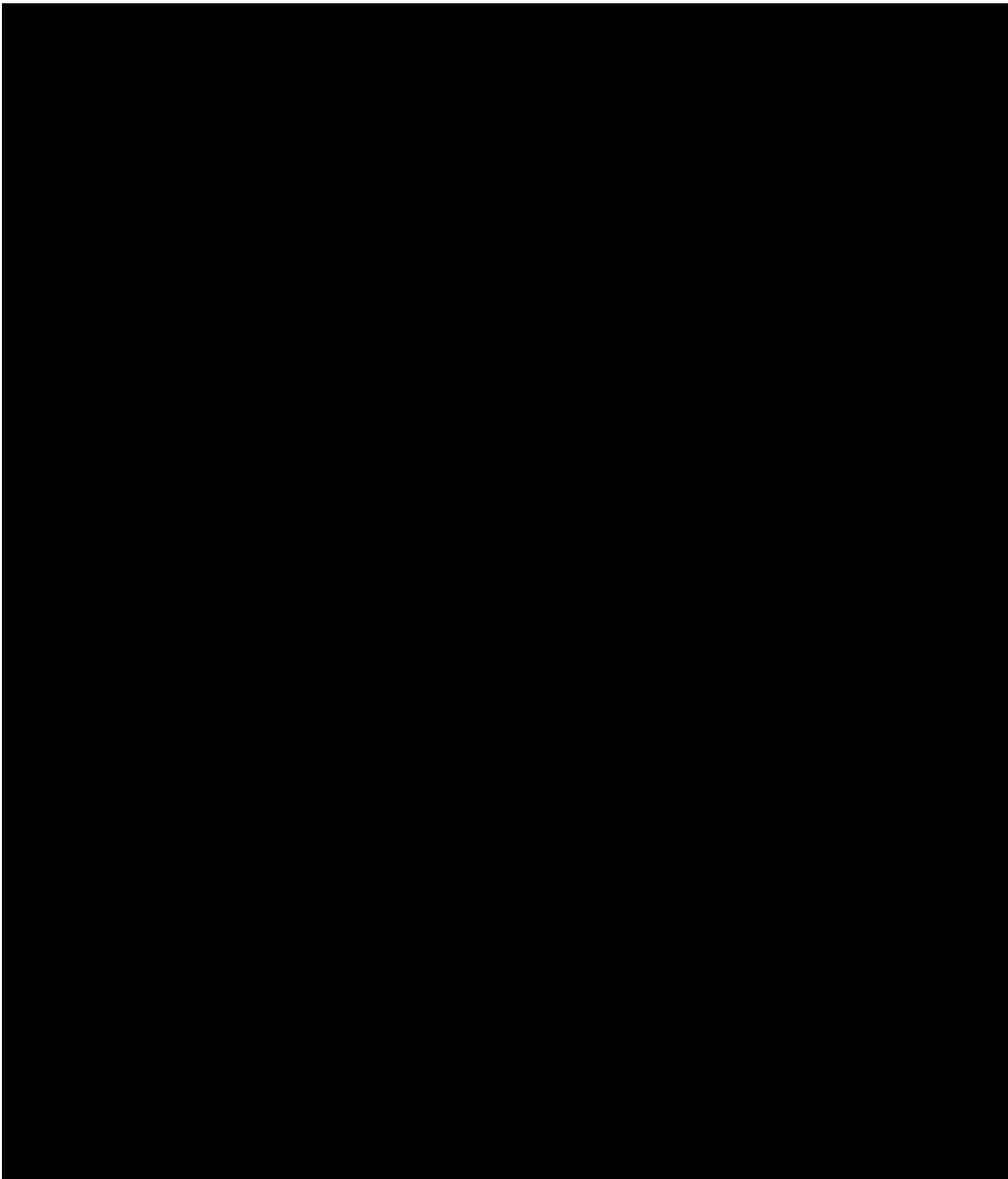


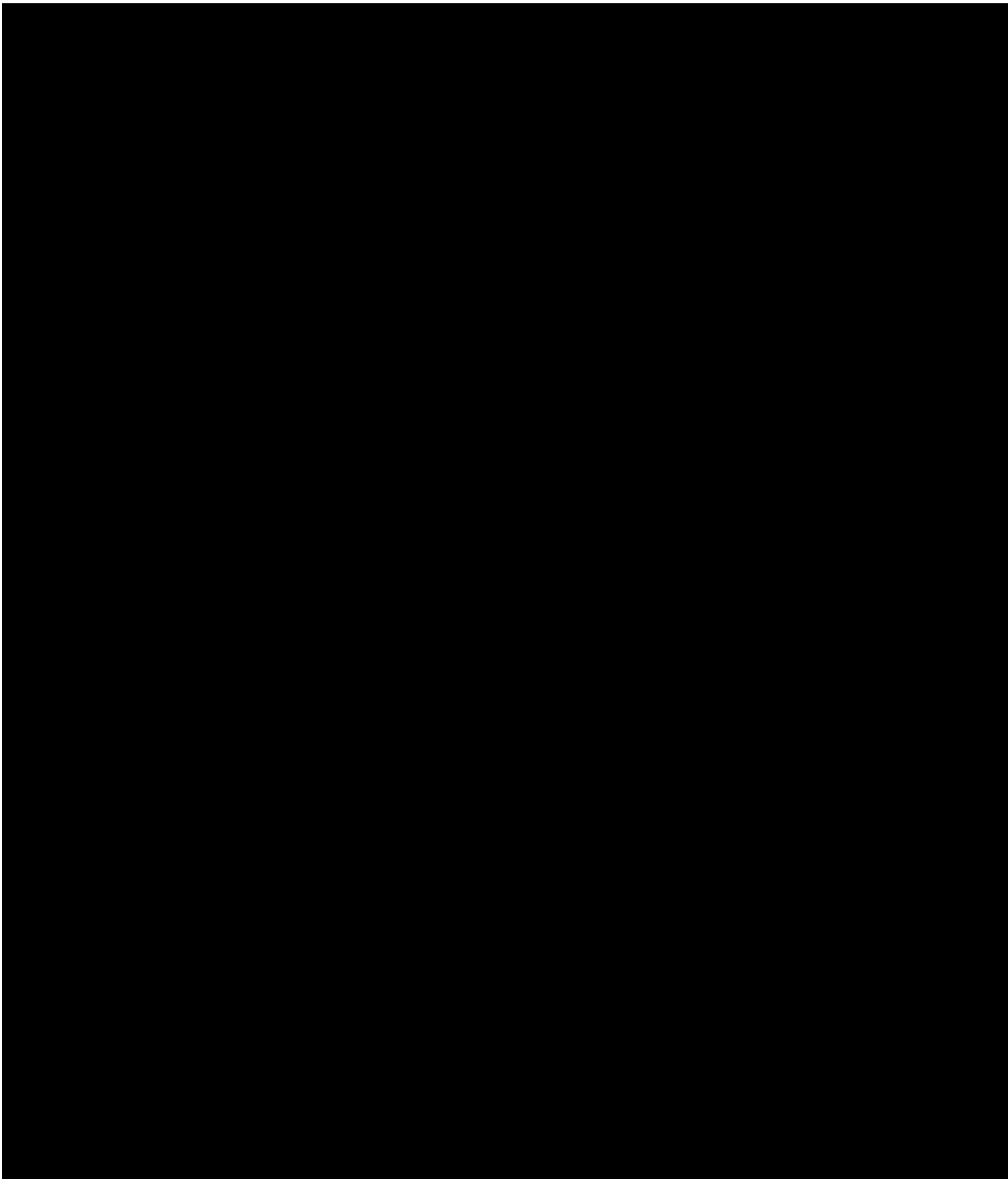


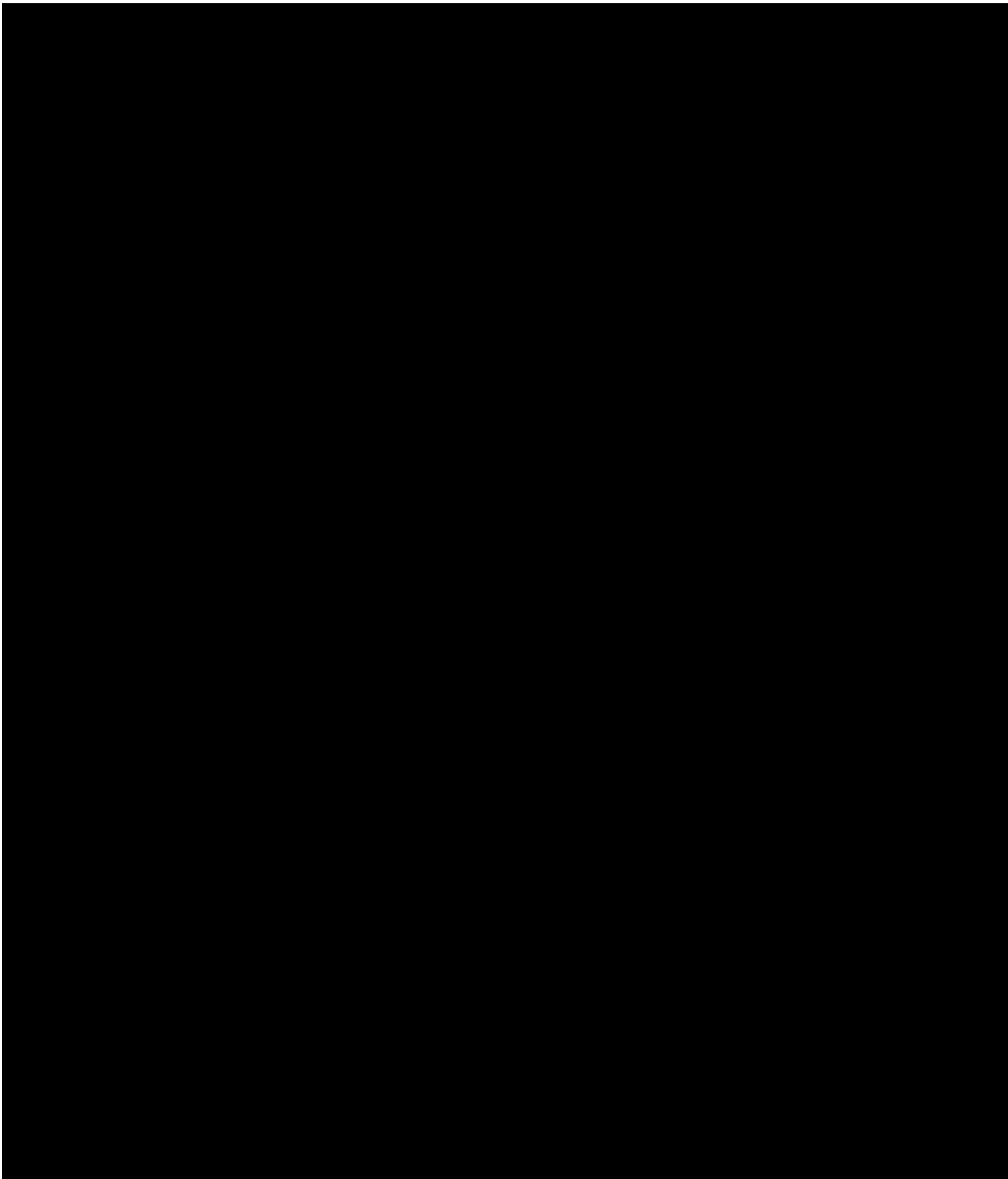




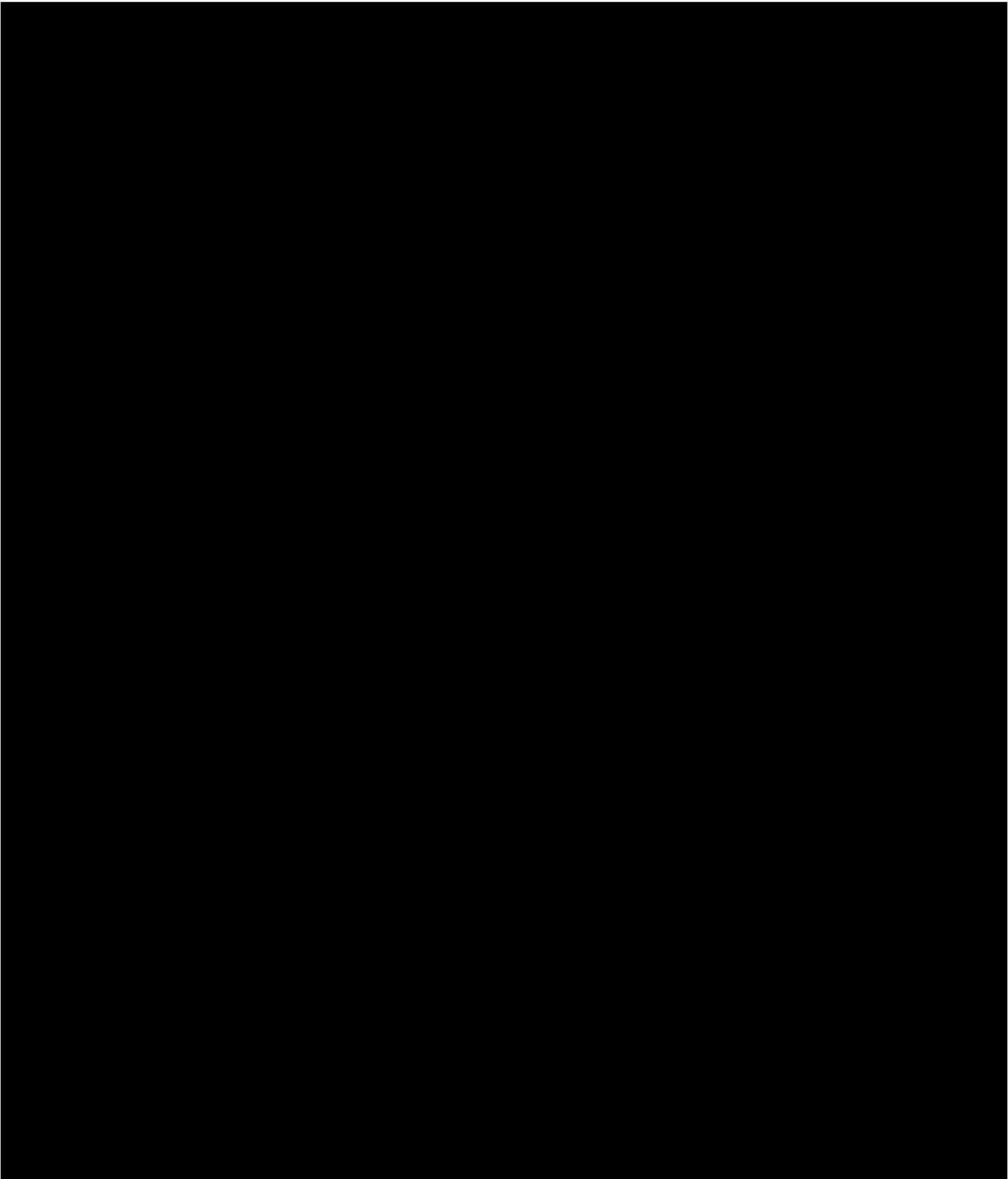


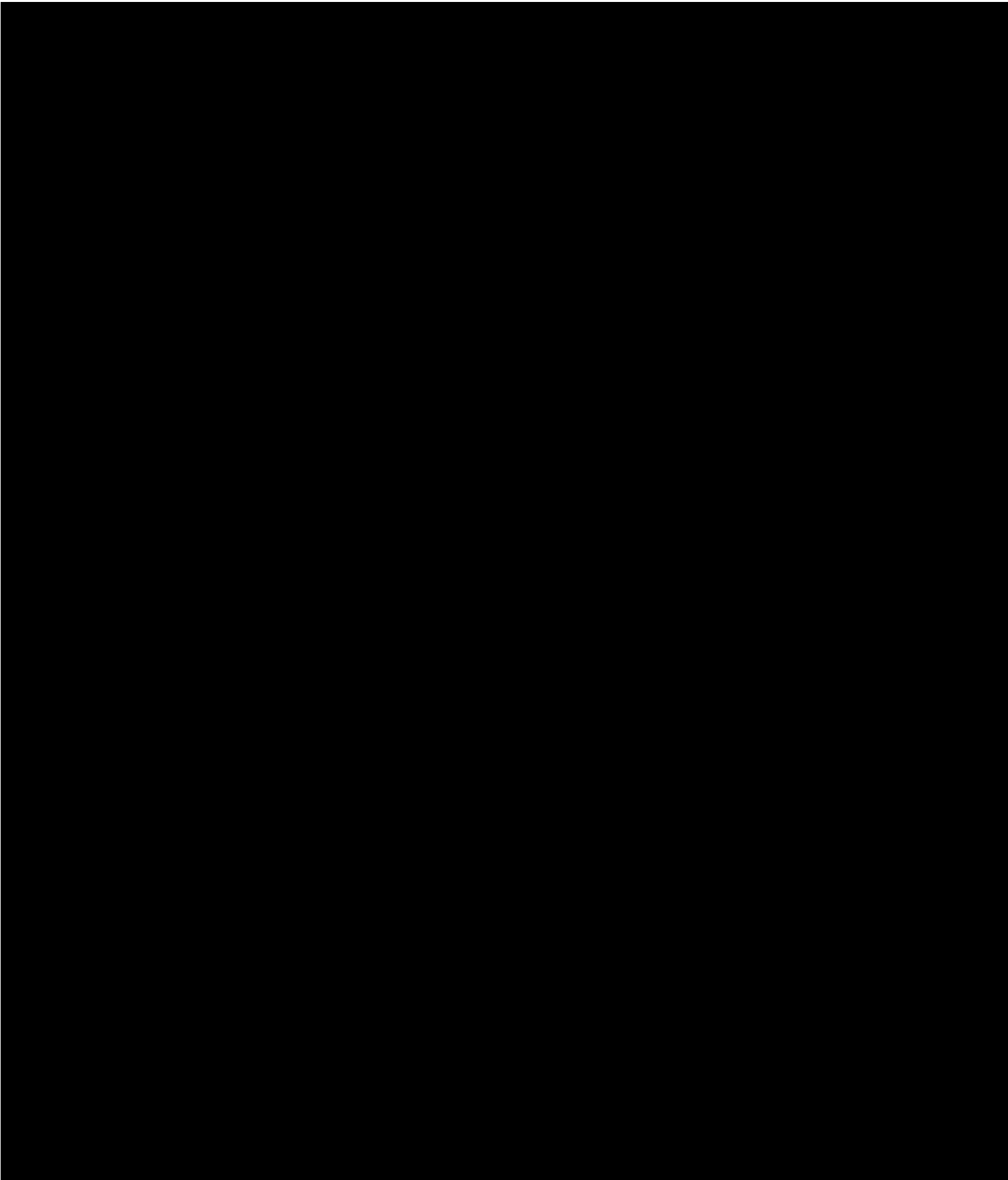


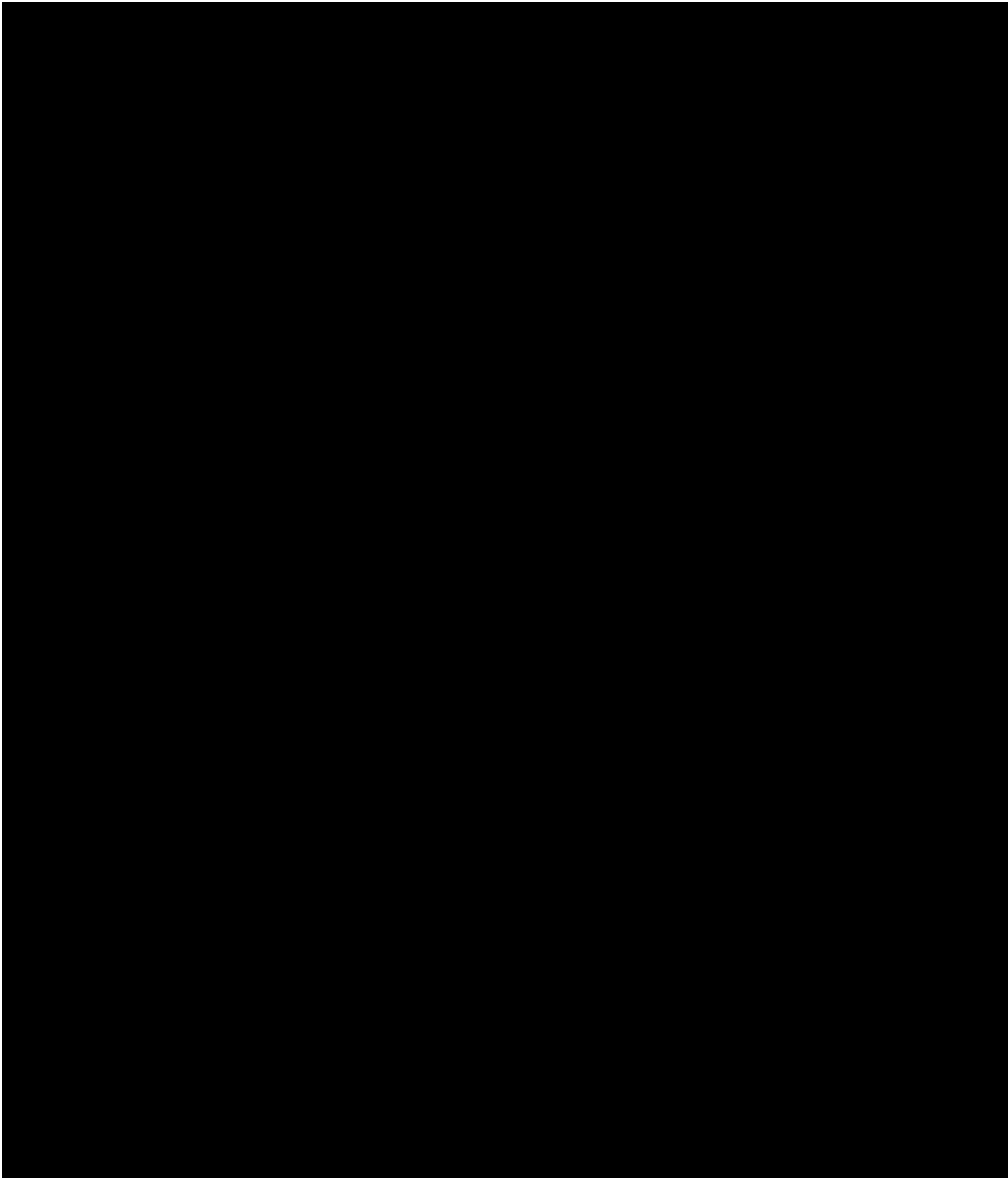












# **EXHIBIT 36**

**ROSS**

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# Announcement

By The Founders - December 11, 2020 - ROSS News

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# ROSS

Dear customers, friends, supporters,

We have made the difficult decision to shut down operations at ROSS Intelligence. As of Monday of this week, we have no longer been accepting new customers. As of January 31, 2021, the ROSS platform will no longer be available. Between now and then, our priority is to help our current customers transition to other services.

## What happened

### Don't Miss Out.

Join the leading minds in legal tech and get the latest news and updates on the law, legal technology,

Since then, we've created a product that legal researchers love. We've worked with amazing partners to make legal research tasks more efficient and delightful. At every turn, we've been grateful to receive lawyers' and other legal researchers' feedback to shape ROSS's development. We've been honored to serve legal researchers in many contexts across the U.S.: lawyers in large firms and small firms; solo practitioners; students; pro se litigants; academics; librarians; and more.

In the spring of this year, Thomson Reuters and Westlaw brought a spurious lawsuit against ROSS. When the news broke, we were grateful to receive so much community support. However, just as Westlaw devised it to be, this ongoing suit has been heavy for ROSS to bear. Litigation is expensive — no matter how speculative the claims against you nor how worthy your position. With our company ensnared by this legal battle, we have been unable to raise another round of funding to fuel our development and marketing efforts. Our bank account is running out, and we must cease operations in the New Year.

## What this means for our customers

ROSS will continue to be available as it is today until January 31, 2021. Each customer will be able to export their personal data, including all data from their saved folders, beginning in January. We will be working with our customers to transition them to other services — including platforms by our friends at Fastcase, vLex and Casetext. If you are a user, please follow the instructions available [in this link](#).

## What this means for the legal industry

We have not abandoned our vision for access to justice through the use of technology. We will continue to fight the good fight.

However, we are now pursuing that vision in the courthouse rather than the marketplace. Although we are out of funds for our operations, ROSS has insurance for our litigation costs. The company will continue as a going concern so that the

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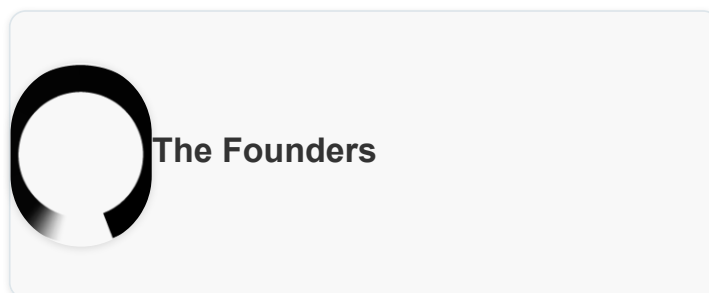
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We hope that by continuing in this way, the precedent this court case sets will inspire innovation rather than shut down competition. We must go, but we will not go gently.

Andrew Arruda, Jimoh Ovbiagele, Pargles Dall'Oglio, and the ROSS team





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## Popular Articles

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**Enough.**


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AI AND THE  
LAW


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partners  
with  
OpenAI for  
the launch  
of its API**

---

ROSS is  
working with  
OpenAI to  
refine their first  
commercial  
product. What  
does that  
mean for AI  
and legal tech?

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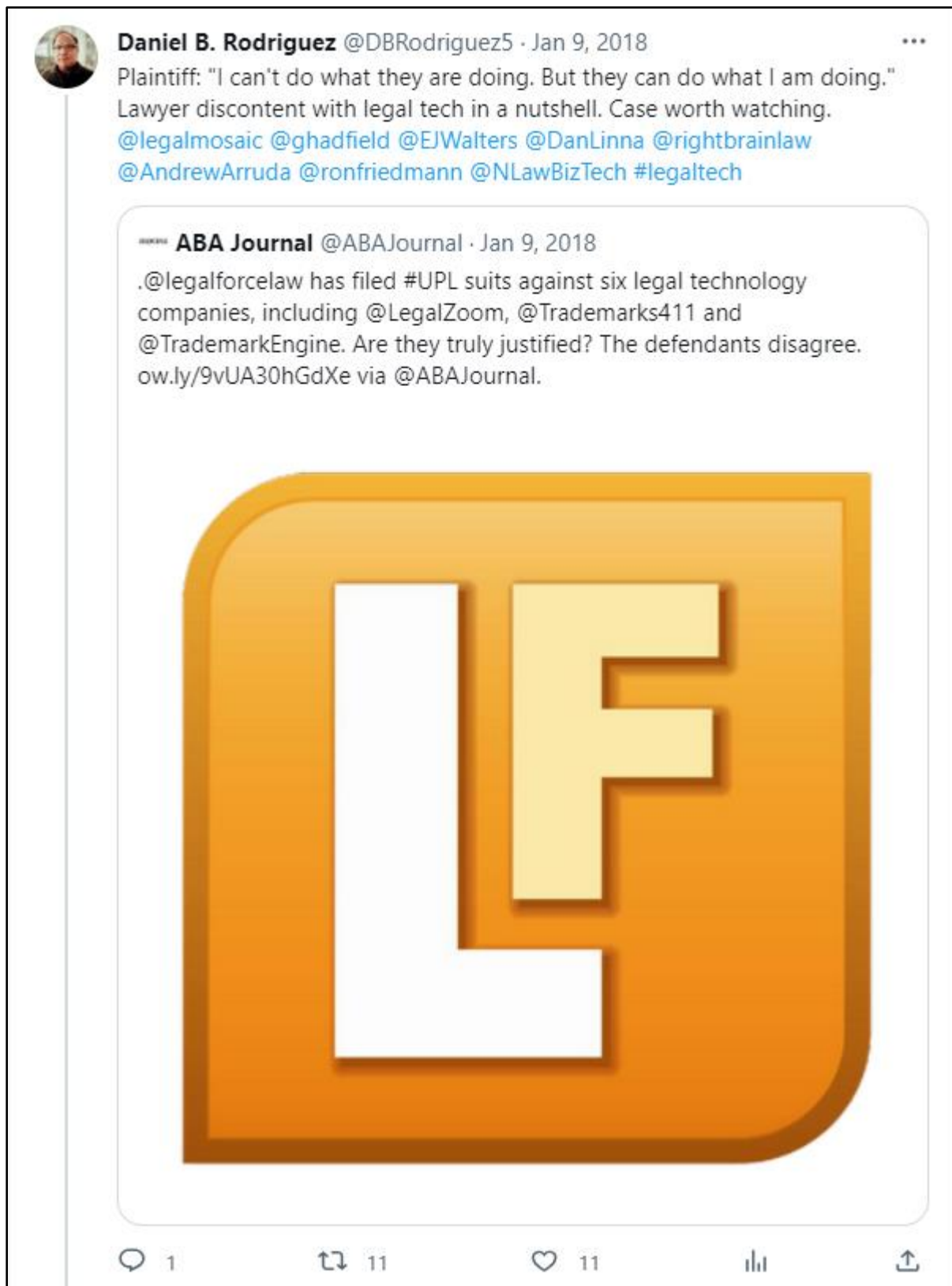
# **EXHIBIT 37**

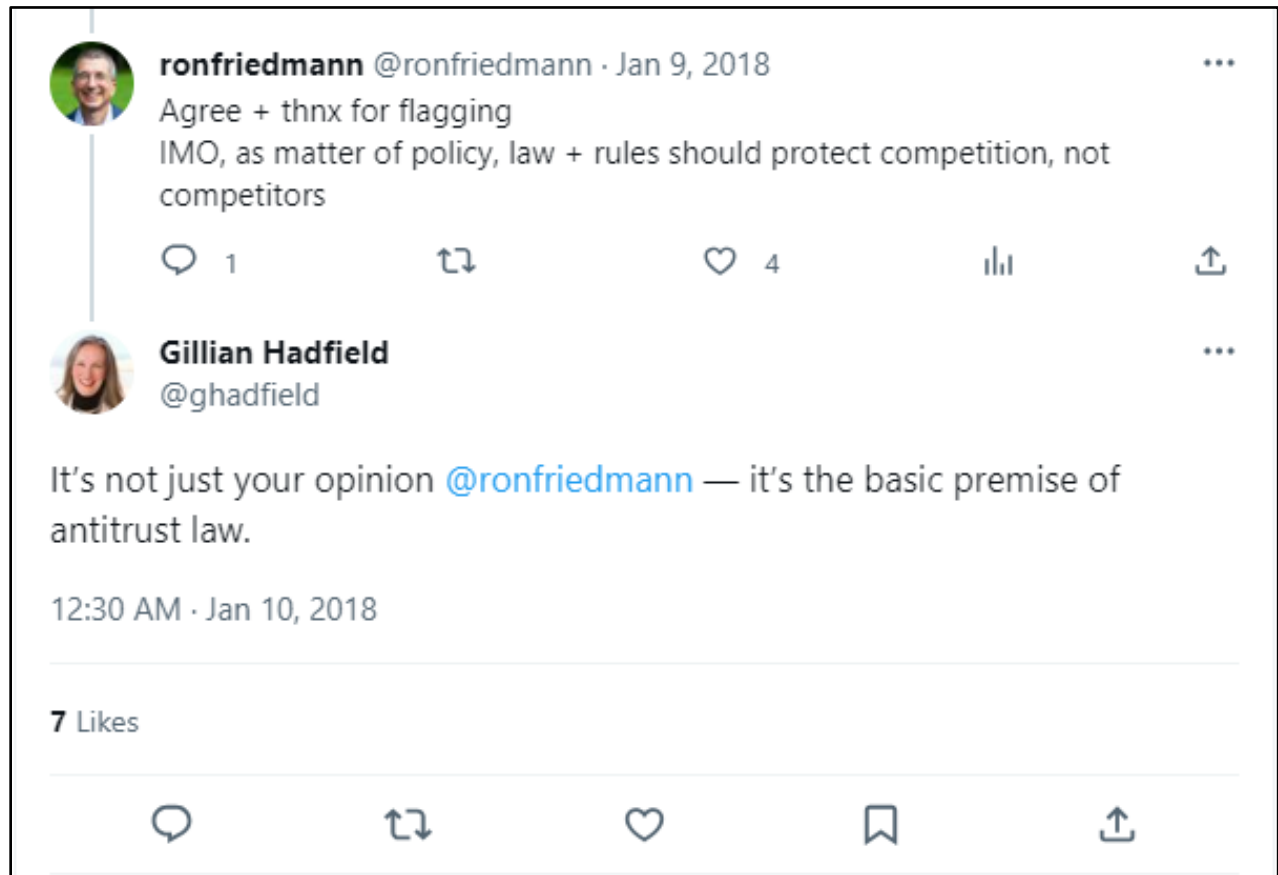
**Native File to be Lodged with Court**

**This Document Produced in Native Format**

# **EXHIBIT 38**

**Deposition Exhibit**  
**Hadfield Twitter Exchanges**









**andrew arruda** @AndrewArruda · Oct 11, 2018

...

So jealous missed @ghadfield's visit to the Toronto office -- fun to see #LegalTech leaders hanging out with the team!

Thank you for coming in and speaking to us Gillian! @findingjimoh and I will have to be there next time you swing by!

**ROSS** @ROSSIntel · Oct 11, 2018

The ROSS team in Toronto was lucky to have the amazing @ghadfield at the office today for an awesome lunch and learn. So happy to have inspirational #LegalTech folks drop in & share their thoughts!

...We're going to change the world!







**Gillian Hadfield** @ghadfield · Nov 1, 2019

Jim Sandman is a hero for #A2J.



**andrew arruda** @AndrewArruda · Oct 31, 2019

"the civil justice system in America is failing. You can measure this failure in many ways...86% of civil legal problems either get inadequate legal help or no legal help at all. We need solutions that are commensurate with the crisis at hand." - @LSCtweets James Sandman

#A2J



2



10



25



 **Gillian Hadfield Retweeted**



**andrew arruda**   @AndrewArruda · Nov 15, 2019

"What makes this time any different? For starters, the legal profession is facing an unprecedented crisis in serving the needs of people with legal problems." - @IAALS

-- A push for legal regulatory form is bubbling up in Canada 



canadianlawyermag.com  
Self-regulation: the end of an era? Lawyer discipline ...  
The customs of the legal profession are feeling the weight of 21st-century stresses


 6
  11
 


 **Gillian Hadfield Retweeted**



**andrew arruda**   @AndrewArruda · Nov 20, 2019

1/2 - "The analysis says that AI will be a significant factor in the future work lives of managers, supervisors, and analysts, shaking up all sorts of white-collar work from law firms, marketing roles, and publishers to computer programming."

[technologyreview.com/f/614739/ai-wi...](https://technologyreview.com/f/614739/ai-wi...)

 1
  3
  7
 


 **Gillian Hadfield Retweeted**



**andrew arruda**   @AndrewArruda · Dec 8, 2019

"Lawyers should embrace the opportunity to use [#designthinking](#) to help enhance access to justice in a human-centred way and ensure that the legal profession remains relevant."



**Mel Craig** @MelCarolCraig · Dec 8, 2019

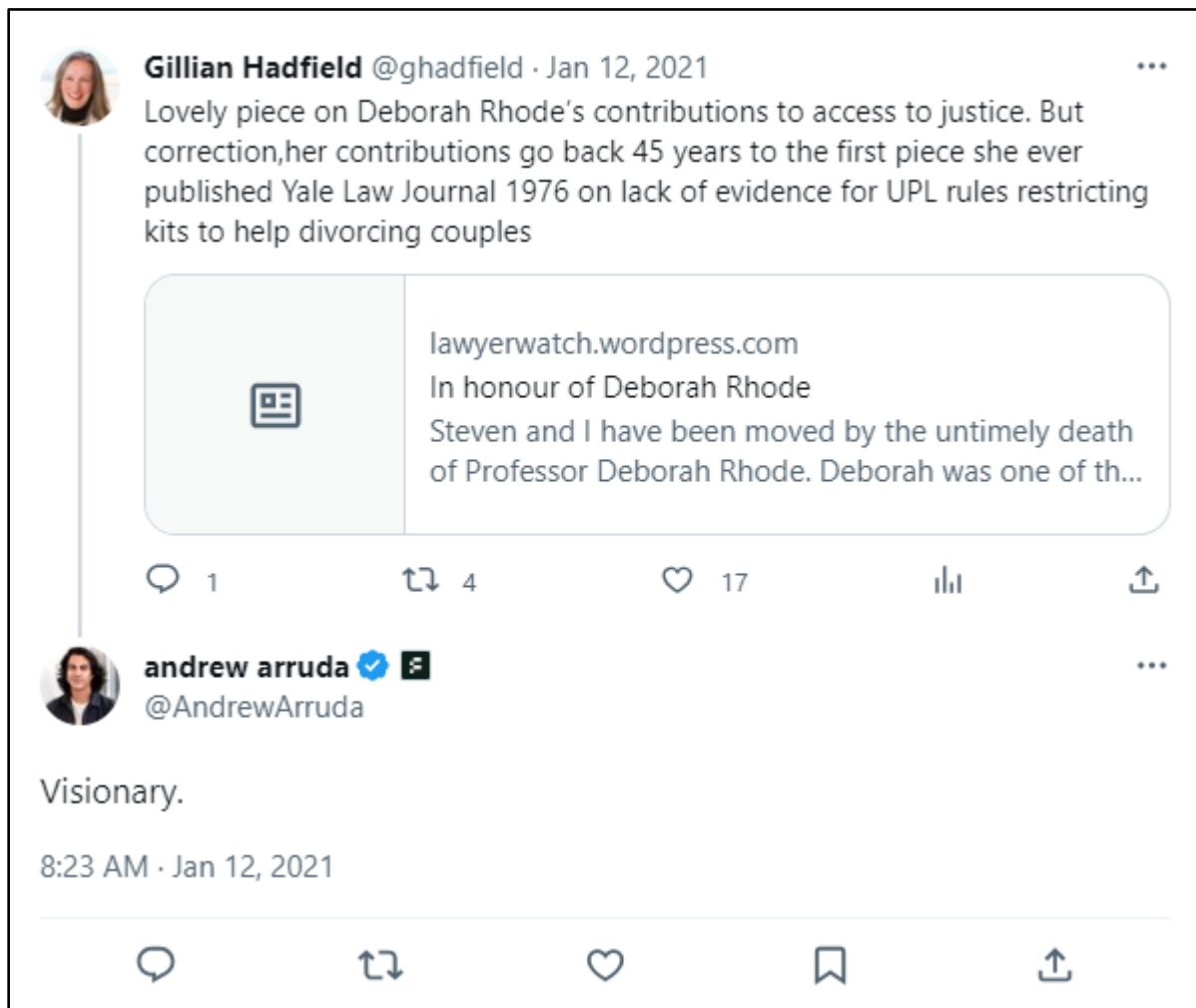
Why the legal profession should embrace user-focused design thinking in developing solutions to aid the access to justice gap #atj #designthinking #legaltech sasklawreview.ca/comment/access...

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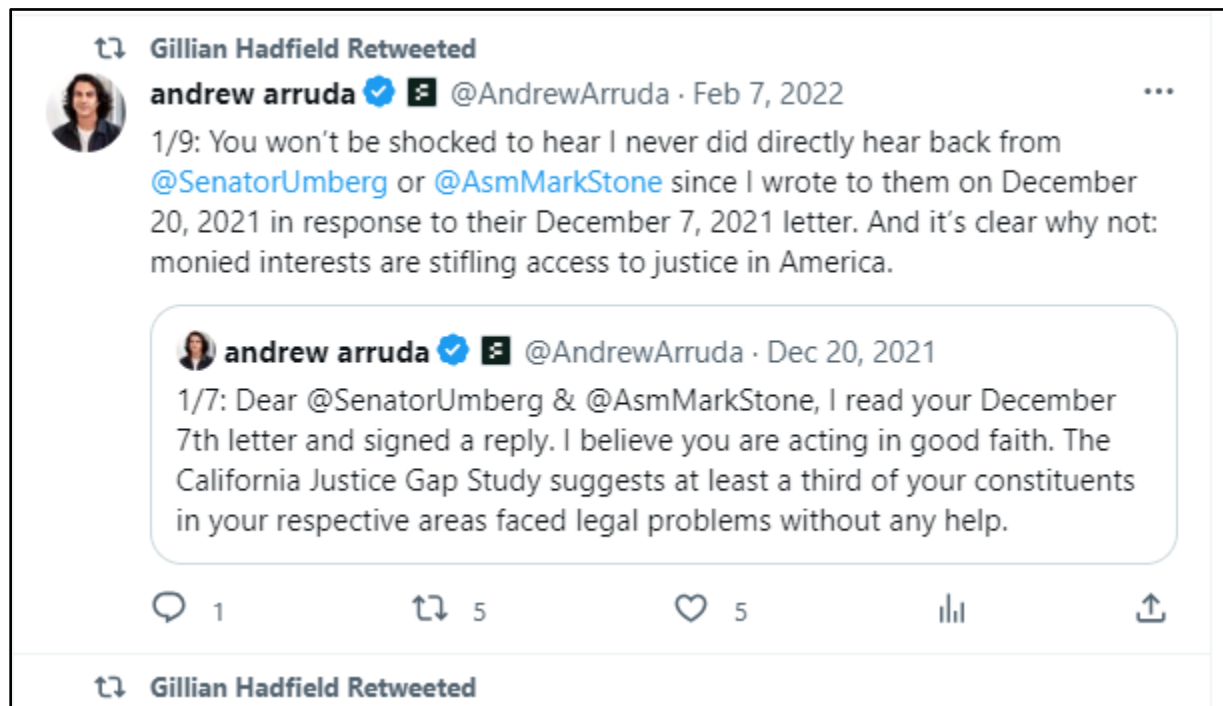












**Gillian Hadfield** @ghadfield · Oct 26, 2022

Love some @andrewarruda time! Great to be in SF and enjoying @TorontoSRI @UofT connections



**andrew arruda** @AndrewArruda · Oct 26, 2022

Great chatting with @ghadfield and @Mawoodin about @UofT's new Arts & Science co-op program! The ASIP program enables companies to hire 3rd & 4th year University of Toronto undergrad students from all arts & science programs...plus I got some 🔥 @welcomeOVO UofT collab gear too!



1



1



10



# **EXHIBIT 39**

**THIS EXHIBIT HAS BEEN  
REDACTED IN ITS ENTIRETY**

# **EXHIBIT 40**

RS 07-28-2023

J. Ratliff

10

# AI for the law, done right

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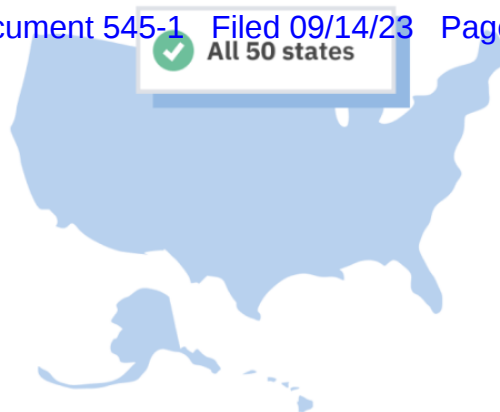
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# **EXHIBIT 41**





Tour Jim's world

Home  
Community  
Academic/professional

Search Jim's world!

Powered by Google™

Click to enlarge

The Cleveland Cascade, circa 1923, on the shores of Lake Merritt

On this page...

Fool on a hill  
Somewhat geeky/wonky  
Singin' the Blue State Blues  
Miscellany

Fool on a hill

Hi! I'm Jim Ratliff. Welcome to my cyberhome.

Nonvirtually, I live on Haddon Hill, above Lake Merritt, in the wonderful city of Oakland, California — accompanied by my sweetie and wife, Eren, and our ~~two~~ three! wonderful kitties, Eco and Bentley — and, now, Wild Kitty!

My community, the Greater Grand Lake district, is vibrant and inspiring and filled with progressive, concerned, and active folk who individually and collectively have become very dear to me.

Oakland has much that's great, has the potential to become even greater, but is also faced by major challenges and threats. Protecting and encouraging the good, while staving off the bad, is my highest priority these days.

And my highest such highest priority is restoring the Cleveland Cascade!

More on me and the community...

Somewhat geeky/wonky

A life-long academic slant steered my professional and career course.

After a physics and math double major at Oberlin, I was a physicist at the University of Texas: Austin, then an economics graduate student at UC Berkeley, followed by a professor at the University of Arizona in Tucson. Now I'm an antitrust economist in a consulting firm in San Francisco.

More on my academic/professional background & history...

Singin' the Blue State Blues

In the 80s, I took to the streets to protest Ronald Reagan's immoral assault on the poor and his illegal war against the Sandinistas.

In the early 90s, I returned to protest Daddy George Bush's testosterone-fueled diversionary slaughter of Iraqi civilians and conscripts in Gulf War I.

Now in the 21<sup>st</sup> Century, it has once again been sadly necessary to return to the streets, this time to express outrage against and shame at the younger-and-dimmer Bush's outrageous, illegal, and unprovoked war against Iraq.

The 2004 election was blow-from-a-hammer disheartening. (How much of a fuck-up does a guy need to be before he gets fired?) Gone was the rationalization that W's first term arose only because he had hid his true colors. Now anyone who cared to know did know what they'd be getting, and the voters chose Bush. It's clear that there's a lot about America and Americans that I don't (or fear to) understand. My response has been to shift my focus more towards Oakland, where I know I can make a difference.

Miscellany

What else?

I've been a principled, steadfast, and devoted Mac owner continuously since I bought my the first 128K Mac in 1984.

Eren and I have both become big fans of Art Deco architecture, furniture, art, and clothing. Oakland has terrific architectural examples. The Bay Area has a very active community of Art Deco devotees.

Me

Jon Stewart, protector of my sanity. He tells it like it is like no other, on the Daily Show

When I'm brave enough to stick a toe of awareness even more deeply into the national-nightmare pool, Paul Krugman (L) and Frank Rich provide great analyses that are simultaneously refreshing and depressing.

Not bad for the New York Times, the paper that did not bring us the WMD story when it really could have counted.

Palm Vx vs. Ratliff, Oakland 2005. 19. ... Na3+, the first of two piece sacrifices

Jim Ratliff

virtualperfection.com/jim/

jim@virtualperfection.com



# **EXHIBIT 42**

**THIS EXHIBIT HAS BEEN  
REDACTED IN ITS ENTIRETY**

# **EXHIBIT 43**



# Scope of Coverage

All ROSS subscriptions include comprehensive coverage of United States law.

- ✓ **Federal case law**  
(published and unpublished)
- ✓ **State legislation**  
(all 50 states, statutes and regulations)
- ✓ **State case law**  
(all 50 states, published and unpublished)
- ✓ **Federal legislation**  
(statutes and regulations)
- ✓ **Specialty court, tribunal, and administrative decisions**

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Circuit Courts of Appeals      All since 1792\*

District Courts      All since 1783

Bankruptcy Courts      All since 1979

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Federal and all 50 state statutes, continually and regularly updated.

REGULATORY COVERAGE

Federal and state regulations (except

\* The ROSS collection contains all decisions since the

period and the first decade after Independence.

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National Labor Relations Board All since 1935

Federal Labor Relations Authority All since 1978

## FEDERAL SPECIALTY COURTS

## UNPUBLISHED CASES

Federal Circuit Courts of Appeals Comprehensive Coverage Starting in 2009\*

District Courts Comprehensive Coverage Starting in 2009

Bankruptcy Courts Comprehensive Coverage Starting in 2009

State Courts Comprehensive Coverage for Most States Starting in 1995\*\*

\*\* Coverage of unpublished decisions in the following states begins in 1995: VA.

\*\* Coverage of unpublished decisions in the following states begins in 1996: MI, MN.

\*\* Coverage of unpublished decisions in the following states begins in 1998: NJ.

\*\* Coverage of unpublished decisions in the following states begins in 2008: MA, PA.

\*\* Coverage of unpublished decisions in the following states begins in 2009: AK, AZ, CA, HI, ID, KY, LA, NV, NM, NY, NC, SC, TX, WA, WI.

\*\* Coverage of unpublished decisions in the following states begins in 2011: IL.

\*\* Coverage of unpublished decisions in the following states begins in 2016: KS.

# ROSS



Court of Customs and Patent Appeals 1929-1982

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United States Tax Court Since 1936

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United States Court of Claims Since 1905

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United States Customs Courts 1949-1980

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Commerce Court 1911-1913

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United States Court of Appeals for the Armed Forces Since 1994

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Special Court, Regional Rail Reorganization Act 1974-2001

---

Temporary Emergency Court of Appeals 1972-1992

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ROSS



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Why ROSS

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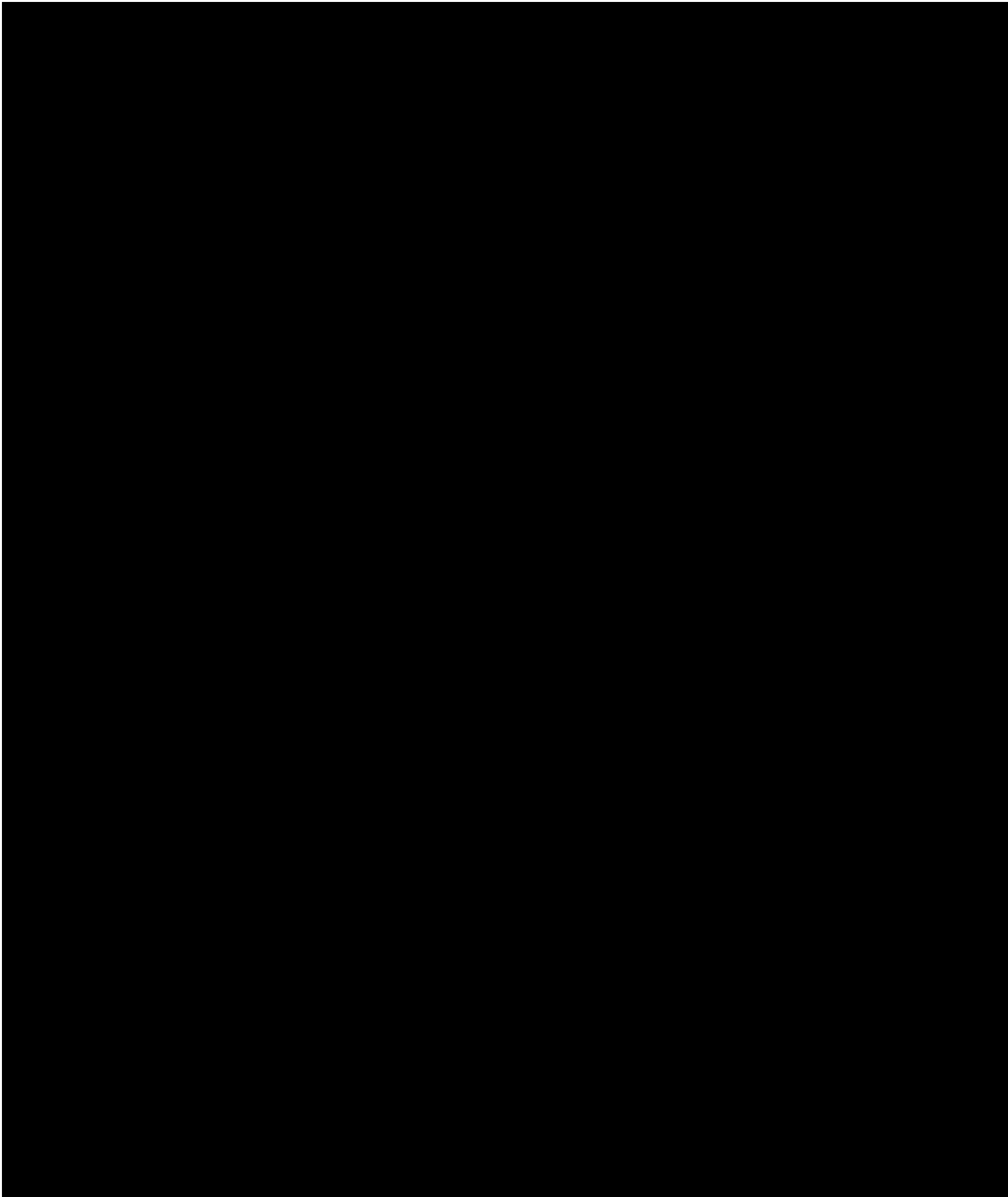
What is AI

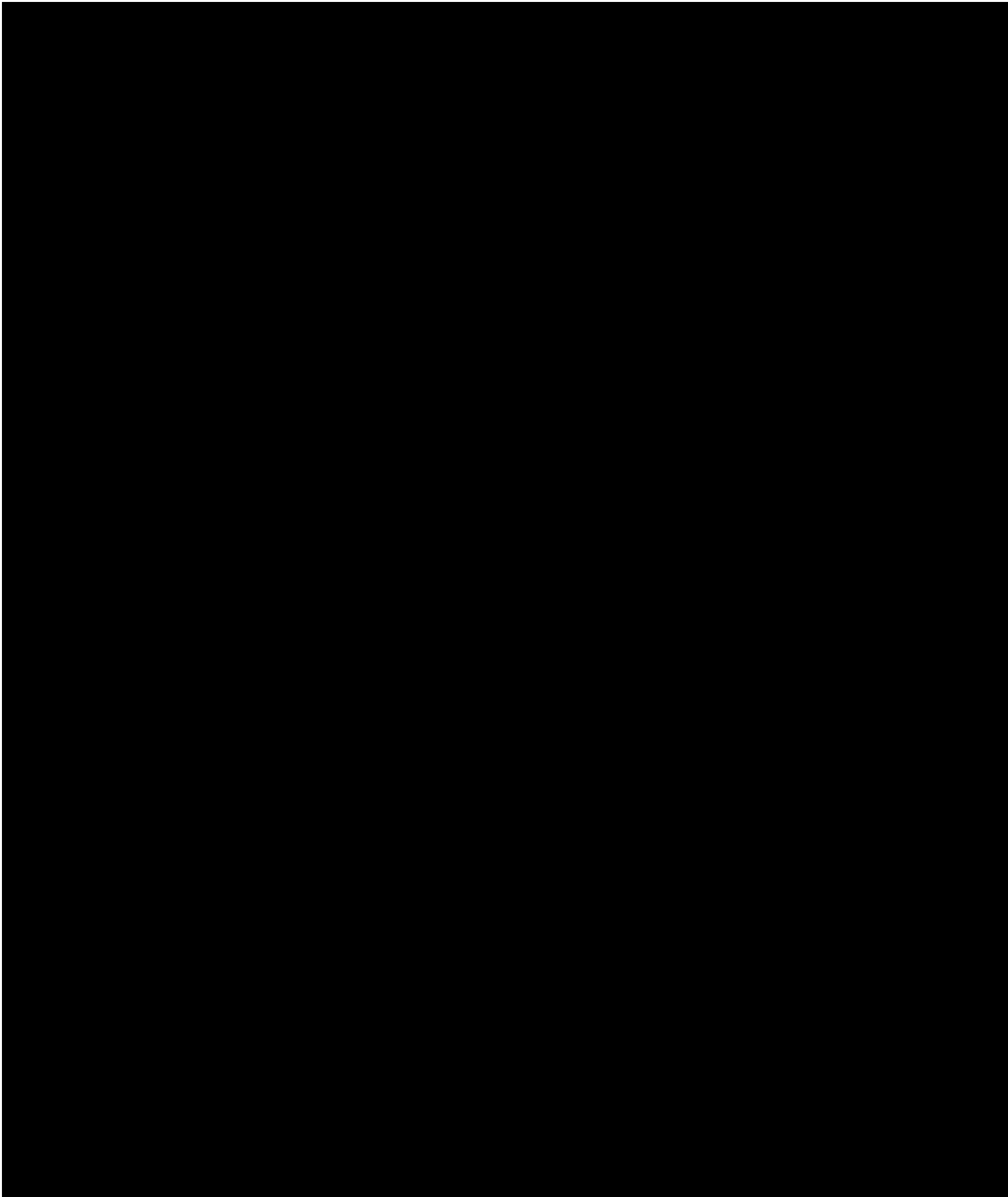
# **EXHIBIT 44**

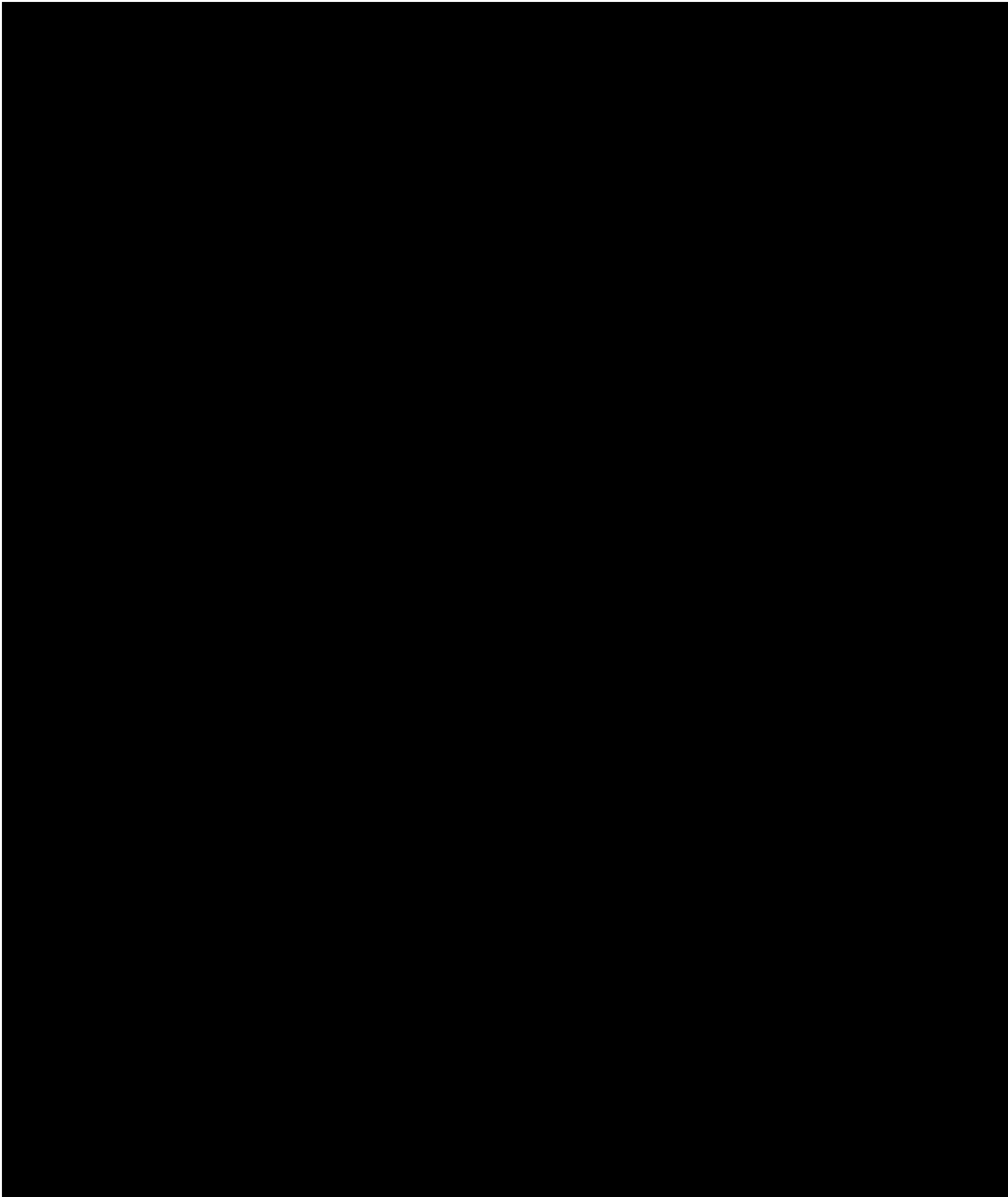
**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

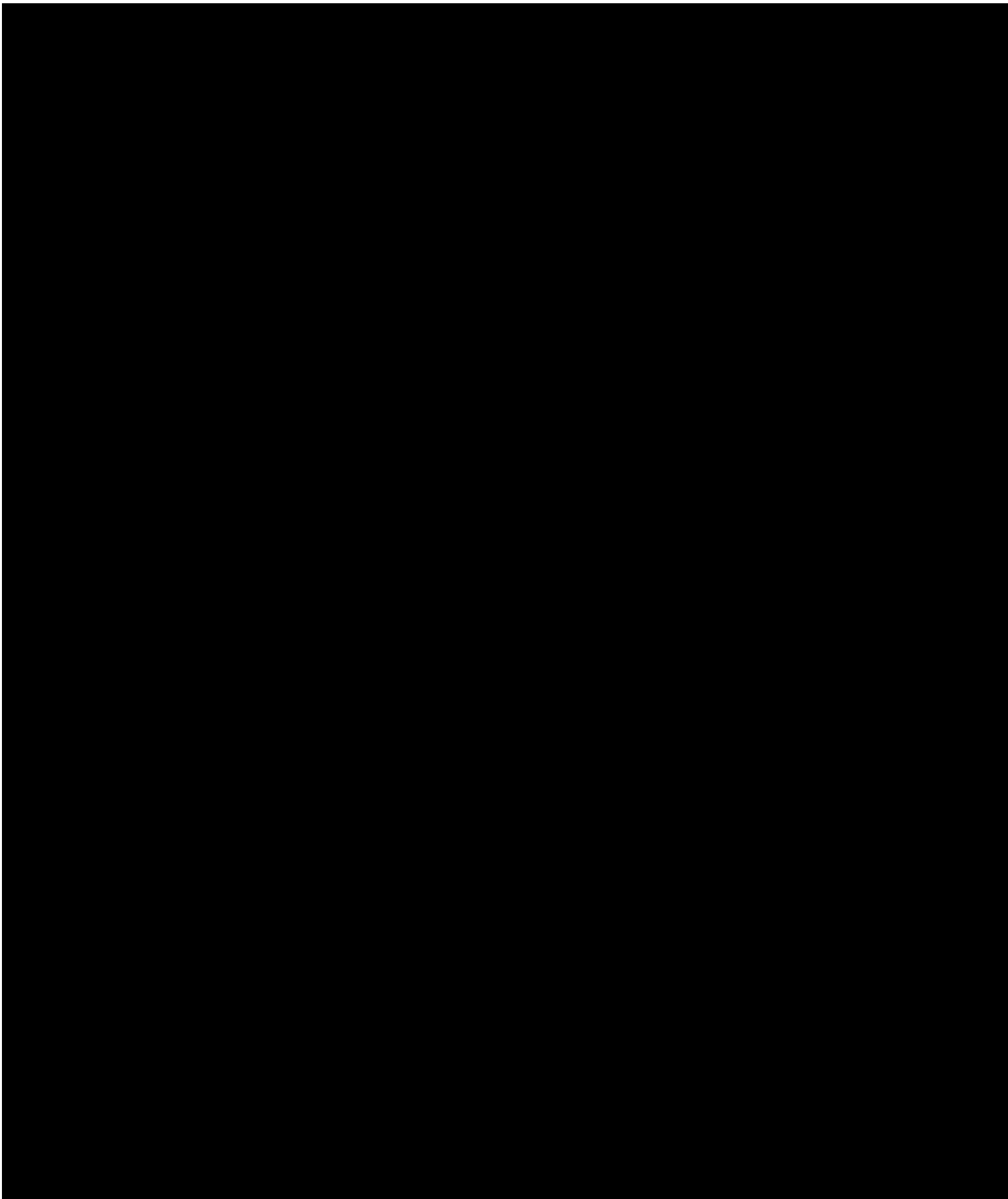
THOMSON REUTERS ENTERPRISE	)	
CENTRE GMBH and WEST PUBLISHING	)	
CORPORATION,	)	
	)	C.A. No. 20-613-SB
Plaintiffs/Counterdefendants,	)	
	)	<b>JURY TRIAL DEMANDED</b>
v.	)	
	)	<b>HIGHLY CONFIDENTIAL-</b>
ROSS INTELLIGENCE INC.,	)	<b>ATTORNEYS' EYES ONLY</b>
	)	
Defendant/Counterclaimant.	)	

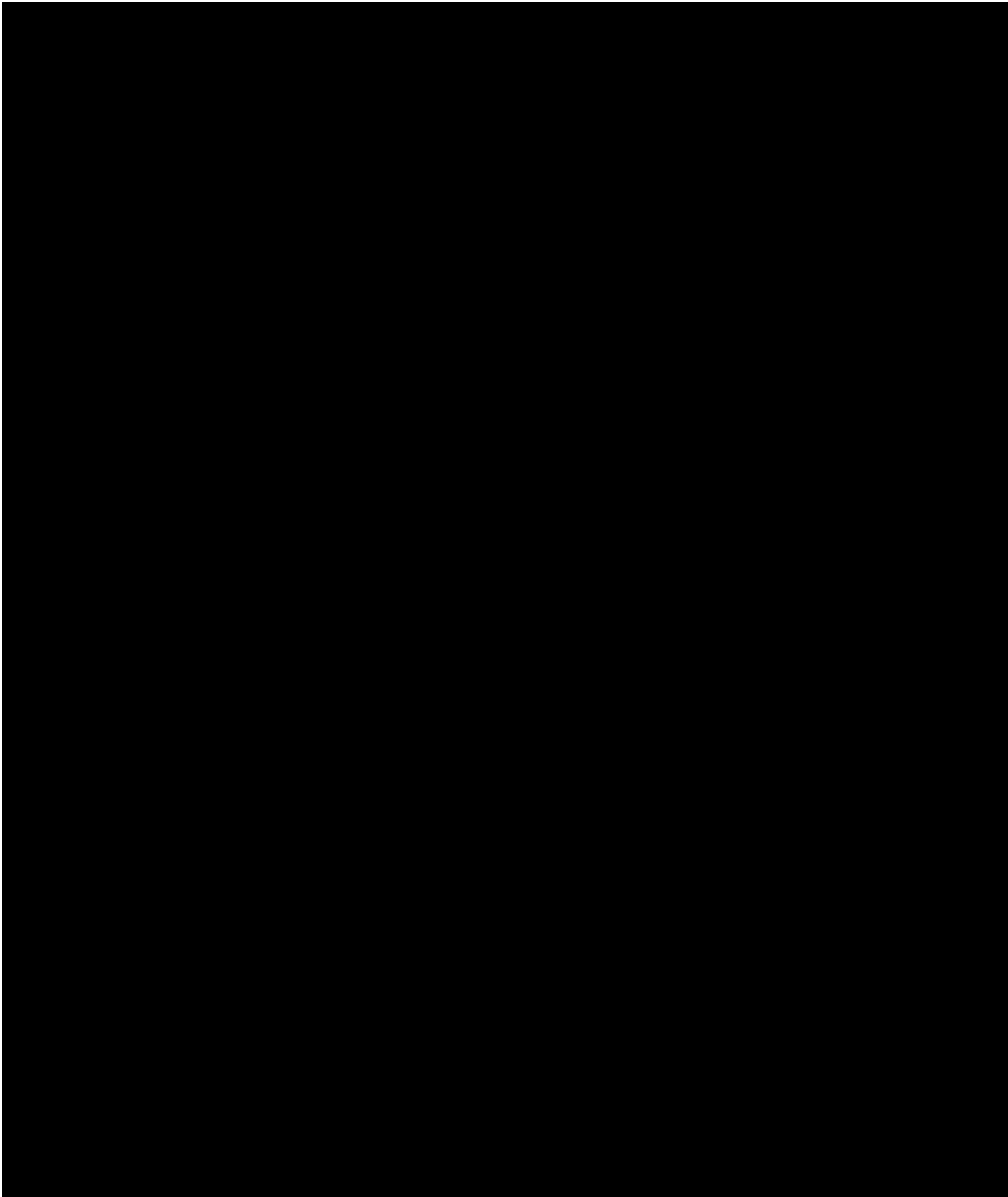
**DEFENDANT AND COUNTERCLAIMANT ROSS INTELLIGENCE  
INC.'S RESPONSE AND OBJECTION TO PLAINTIFFS'  
FIFTH SET OF INTERROGATORIES**



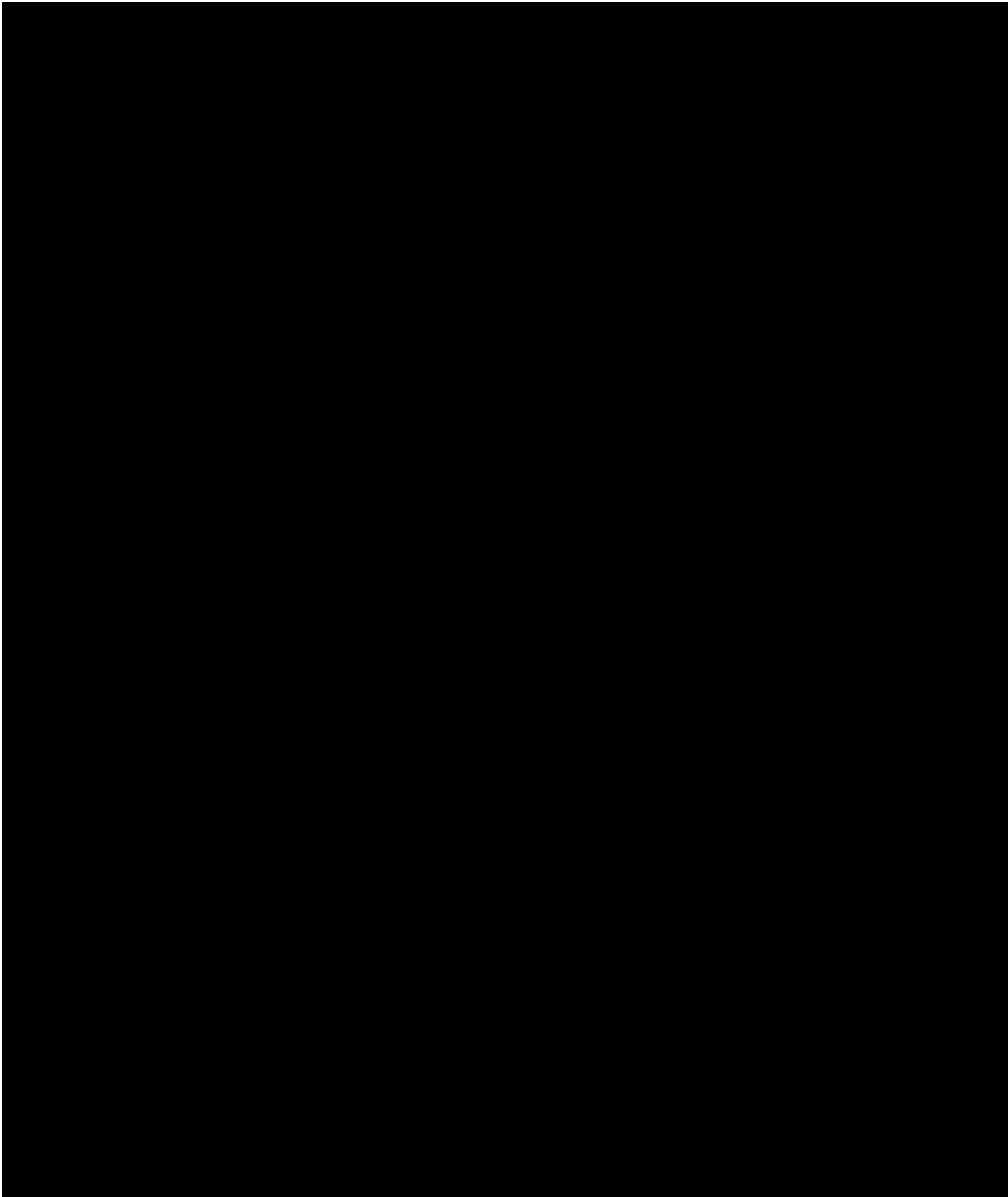


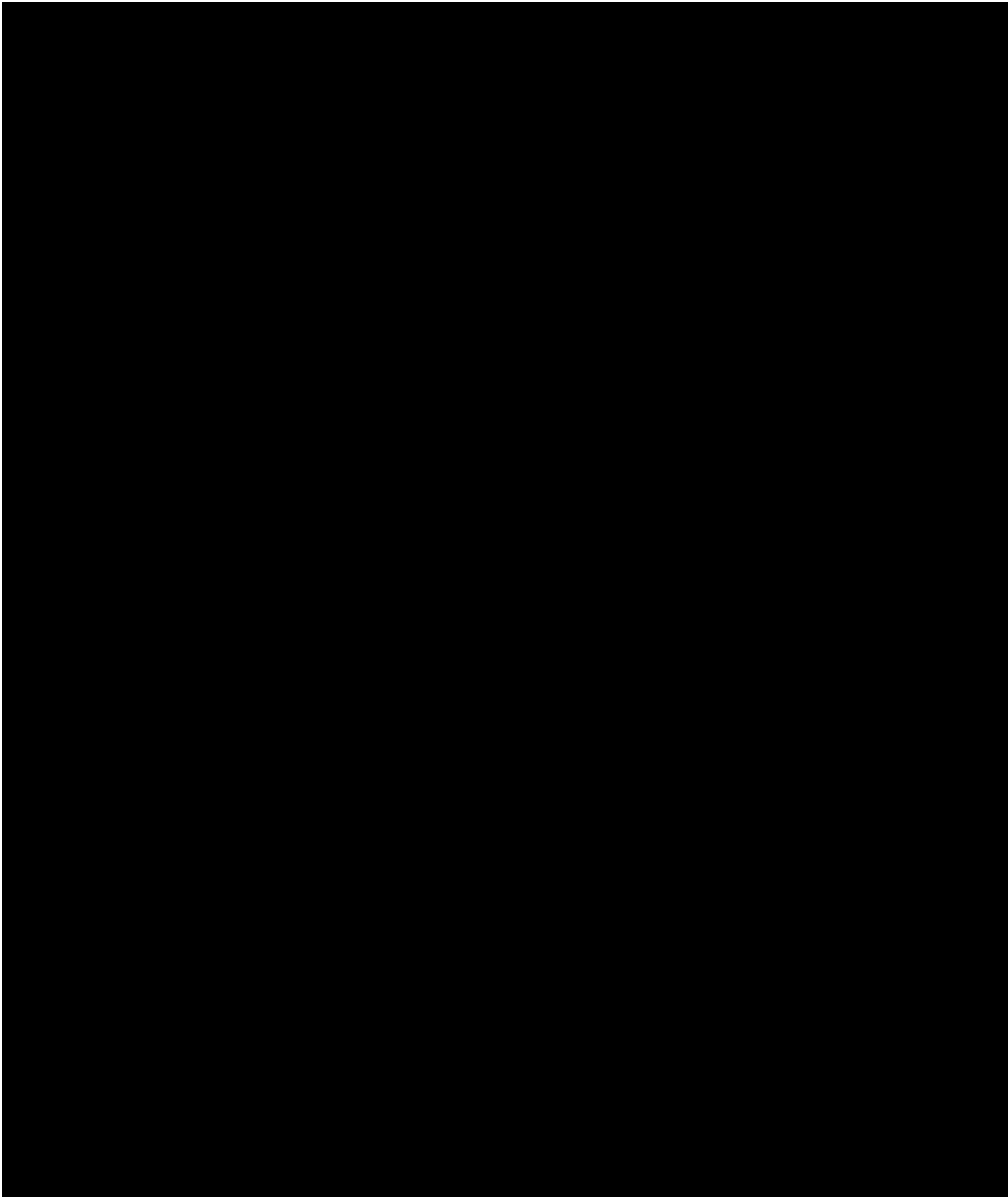


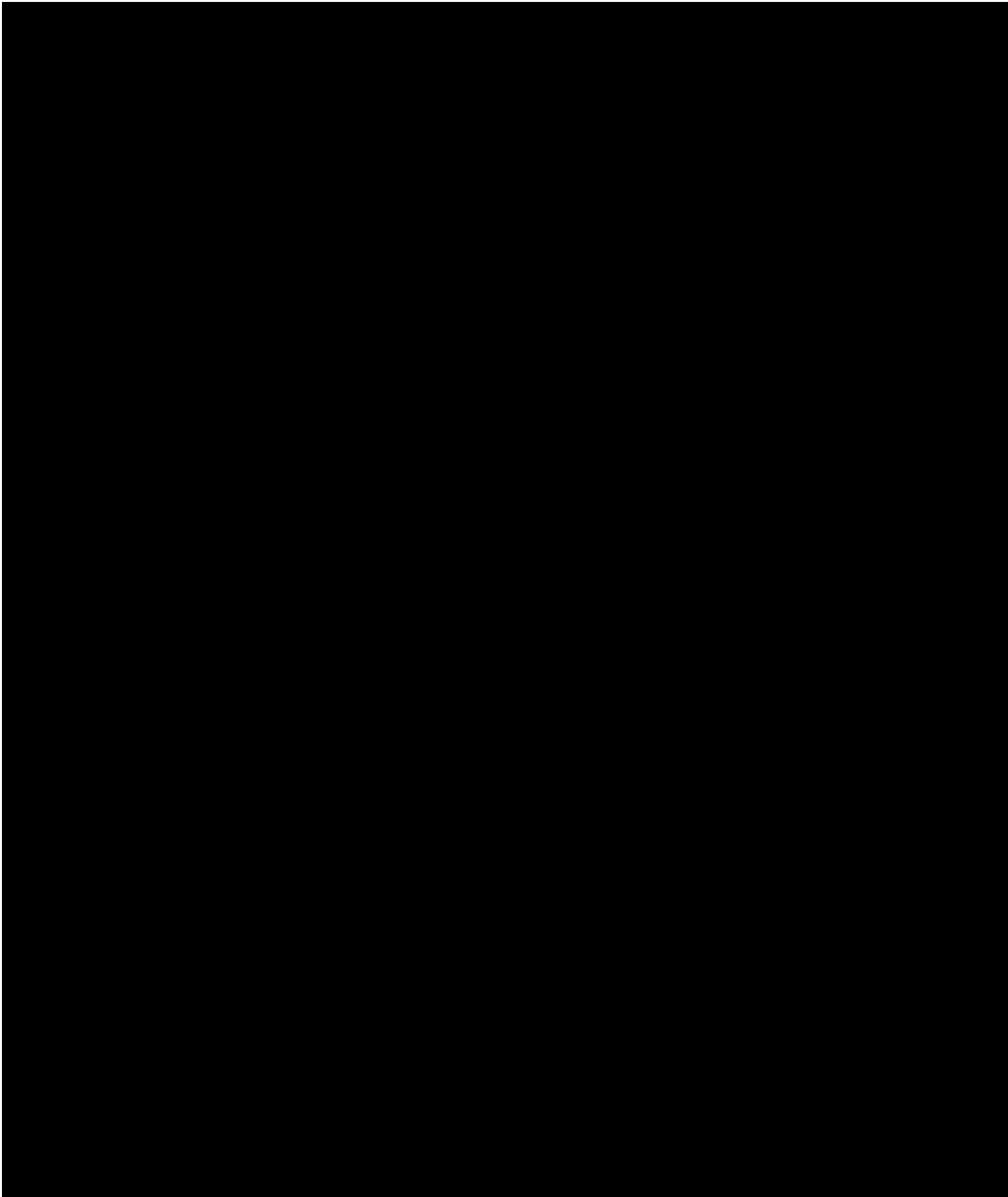


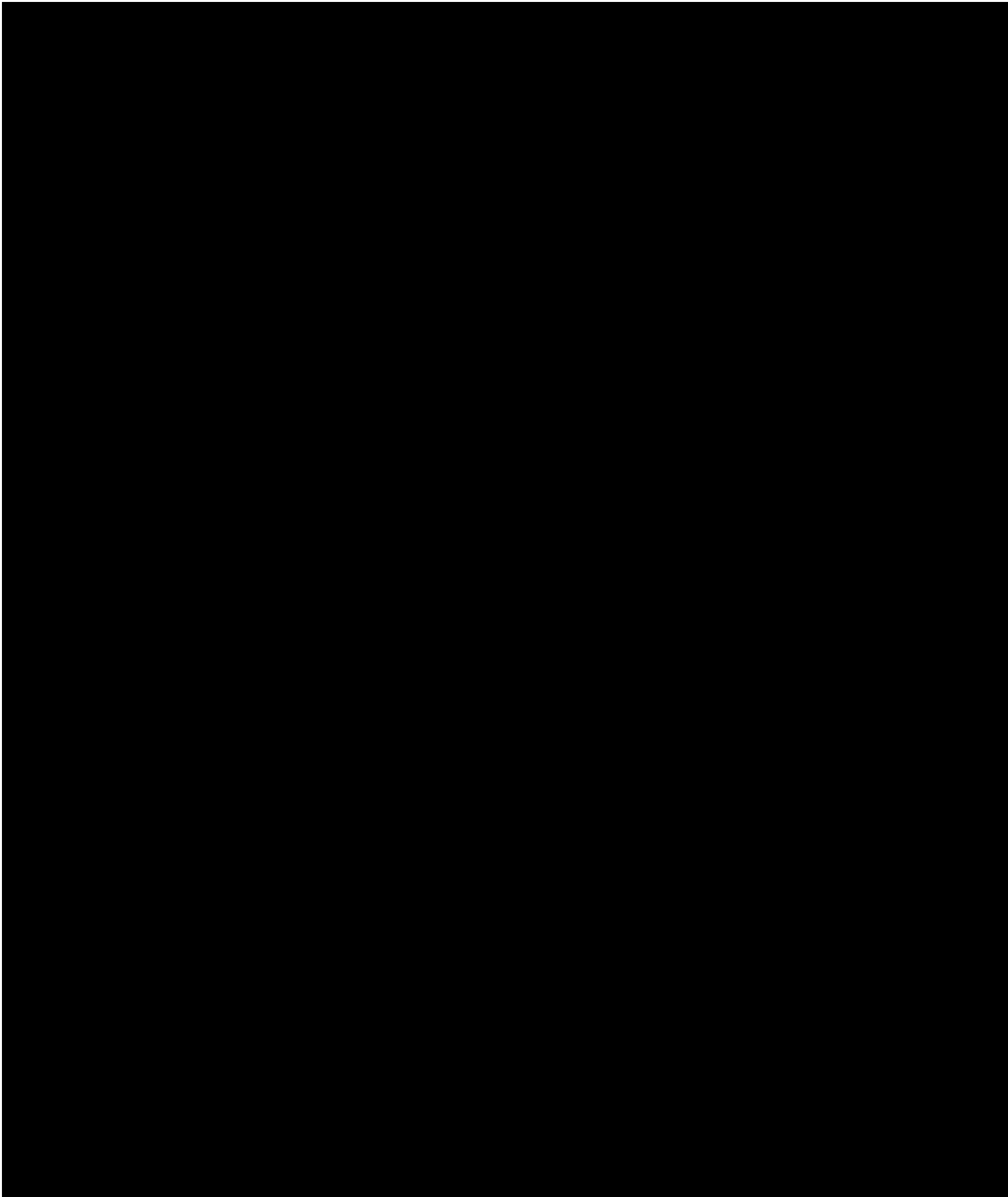


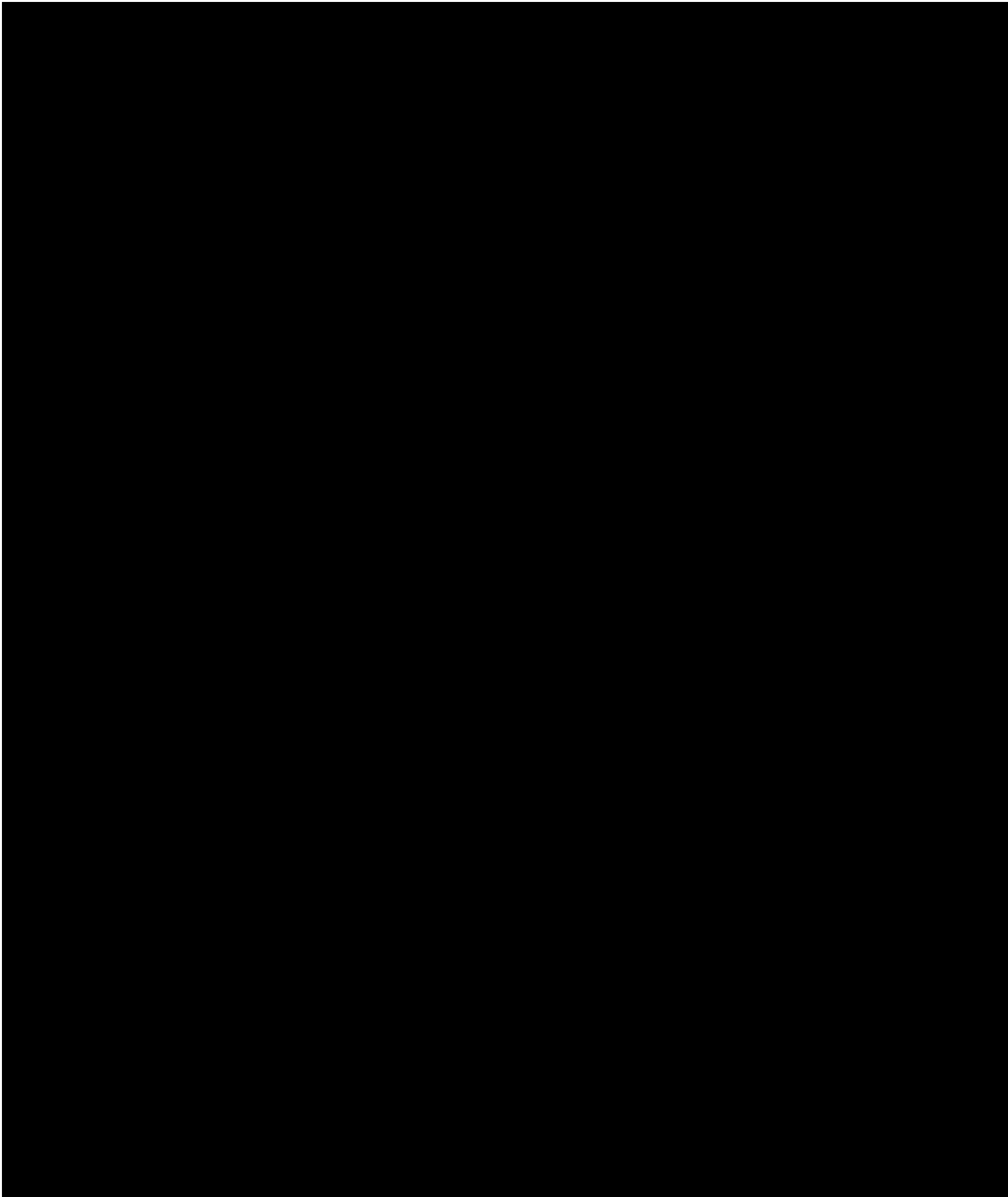


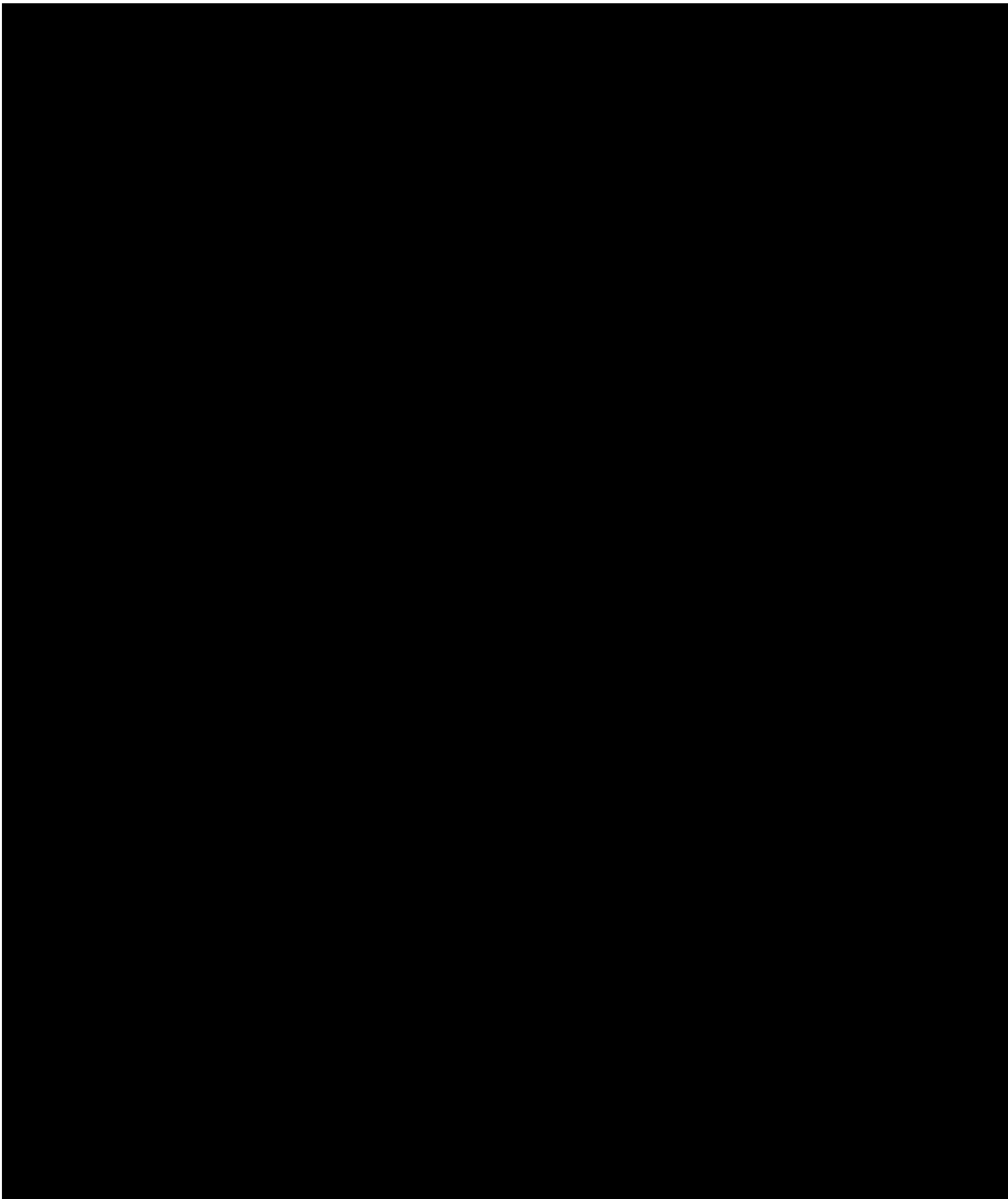


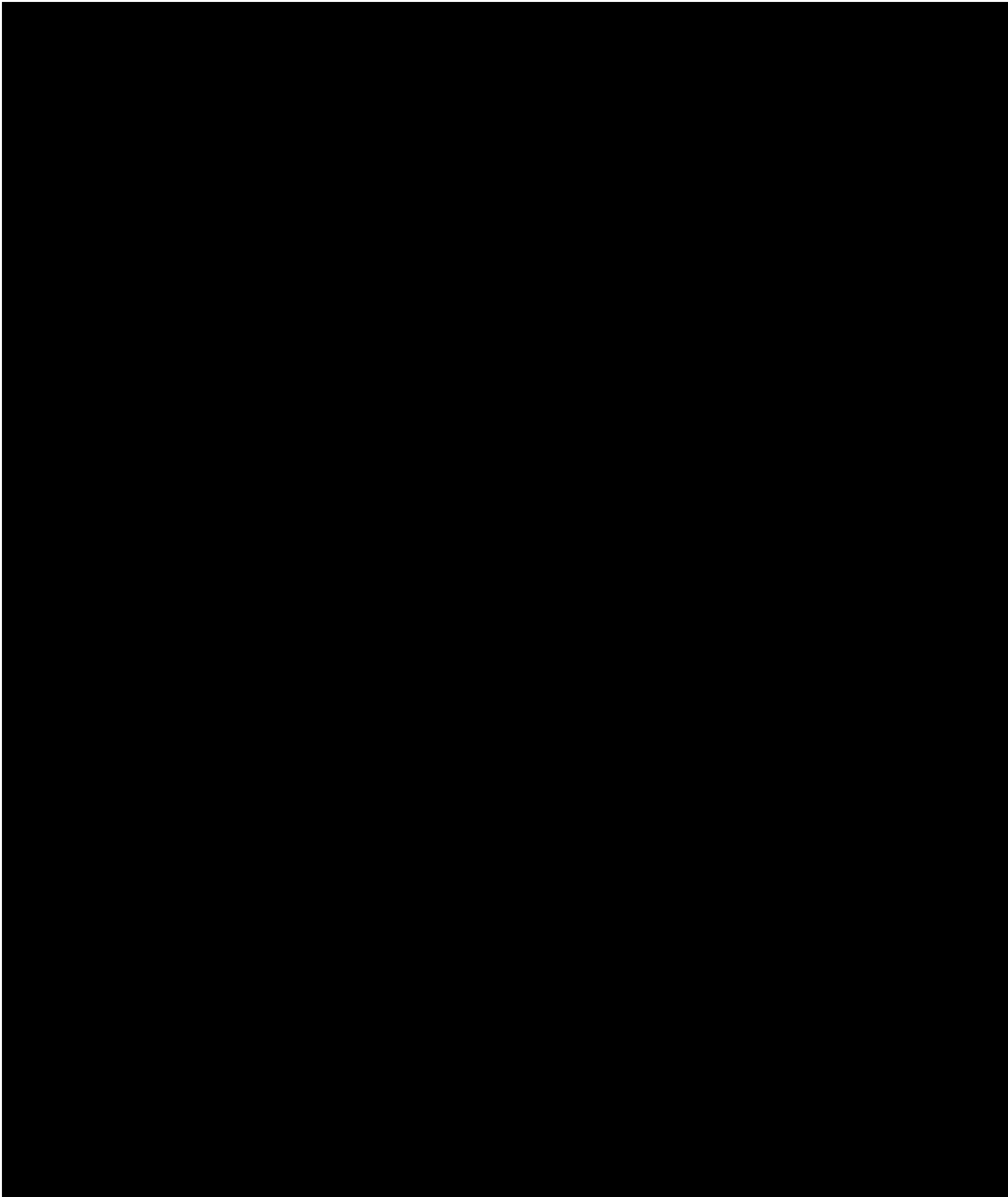


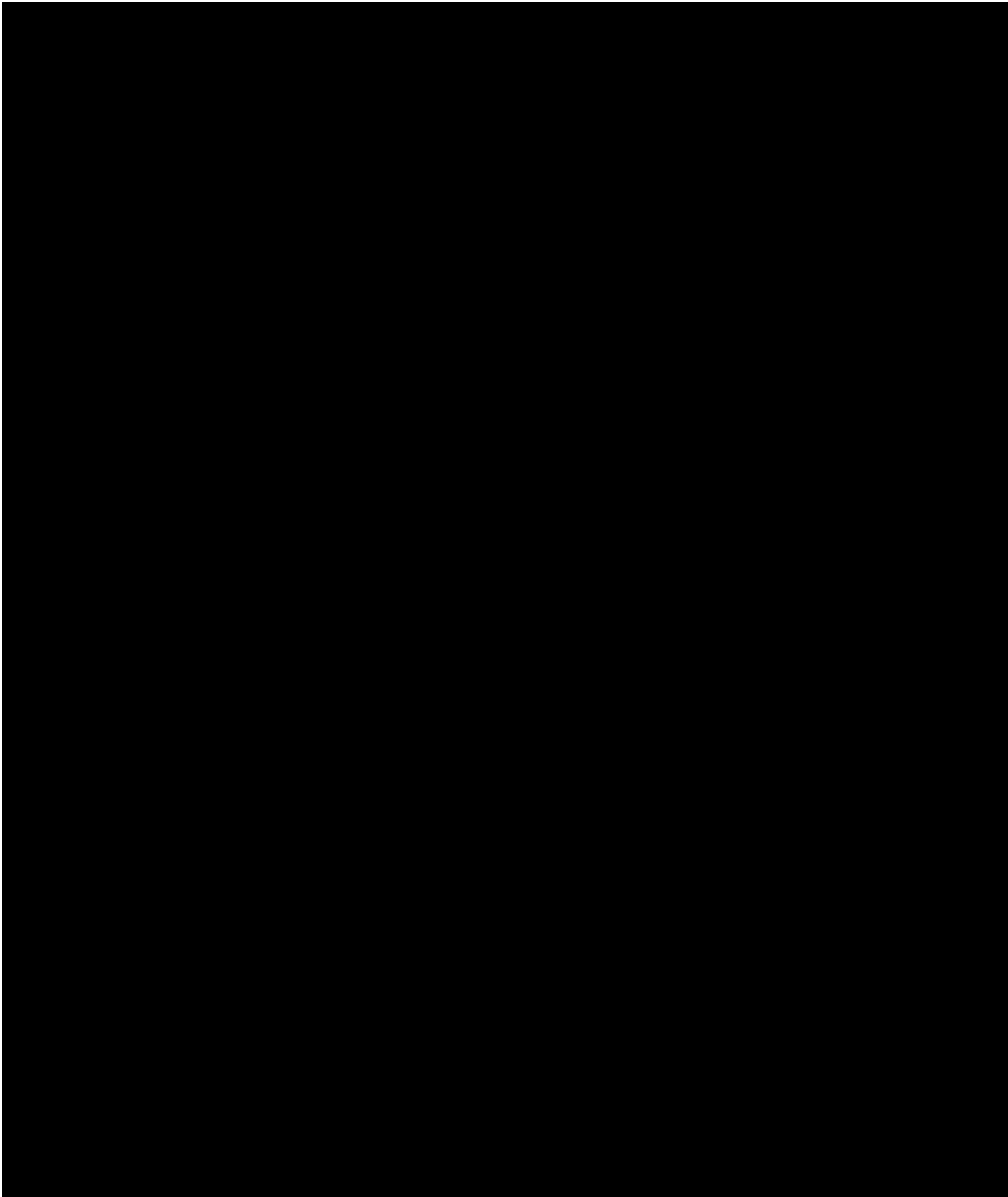




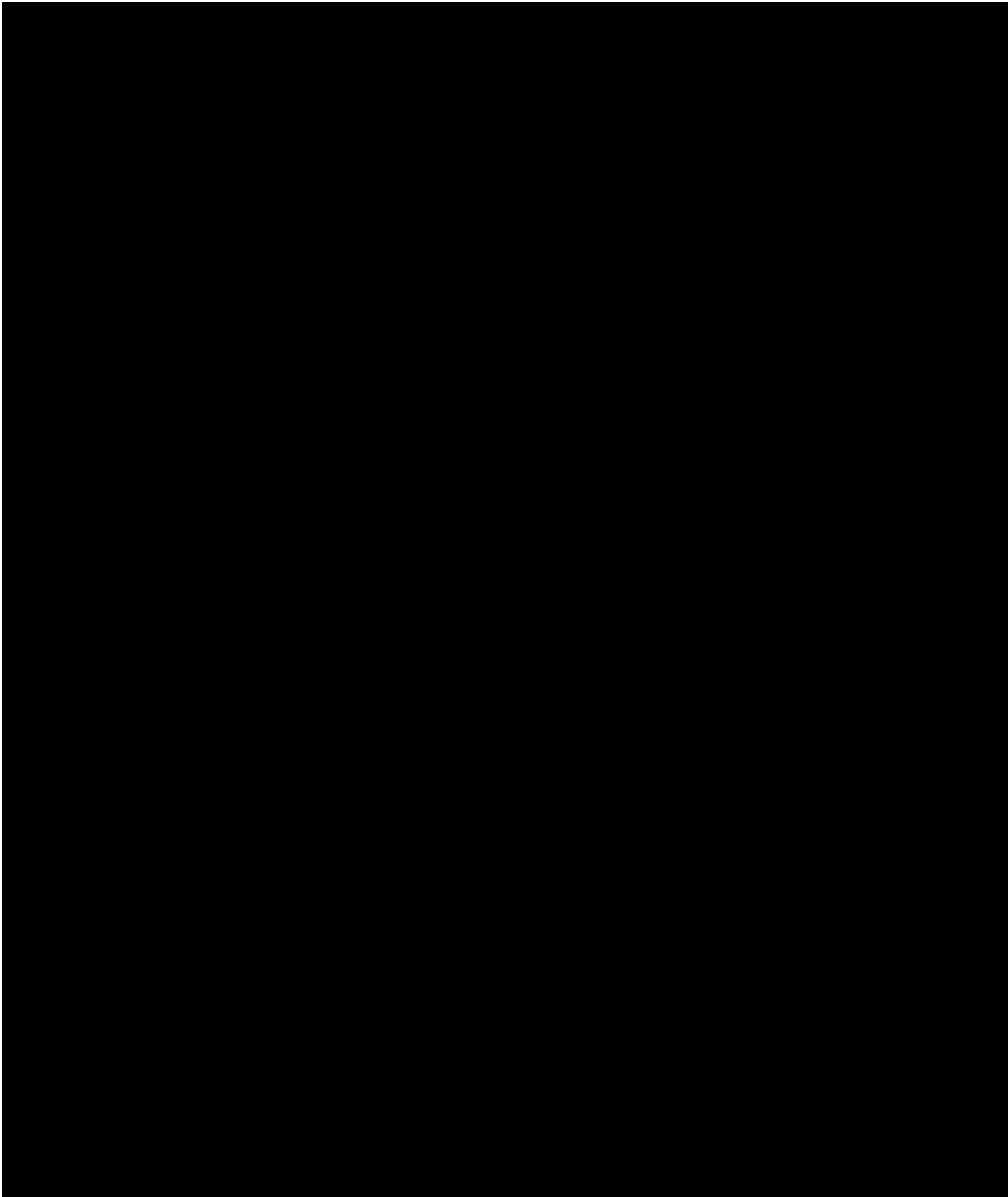


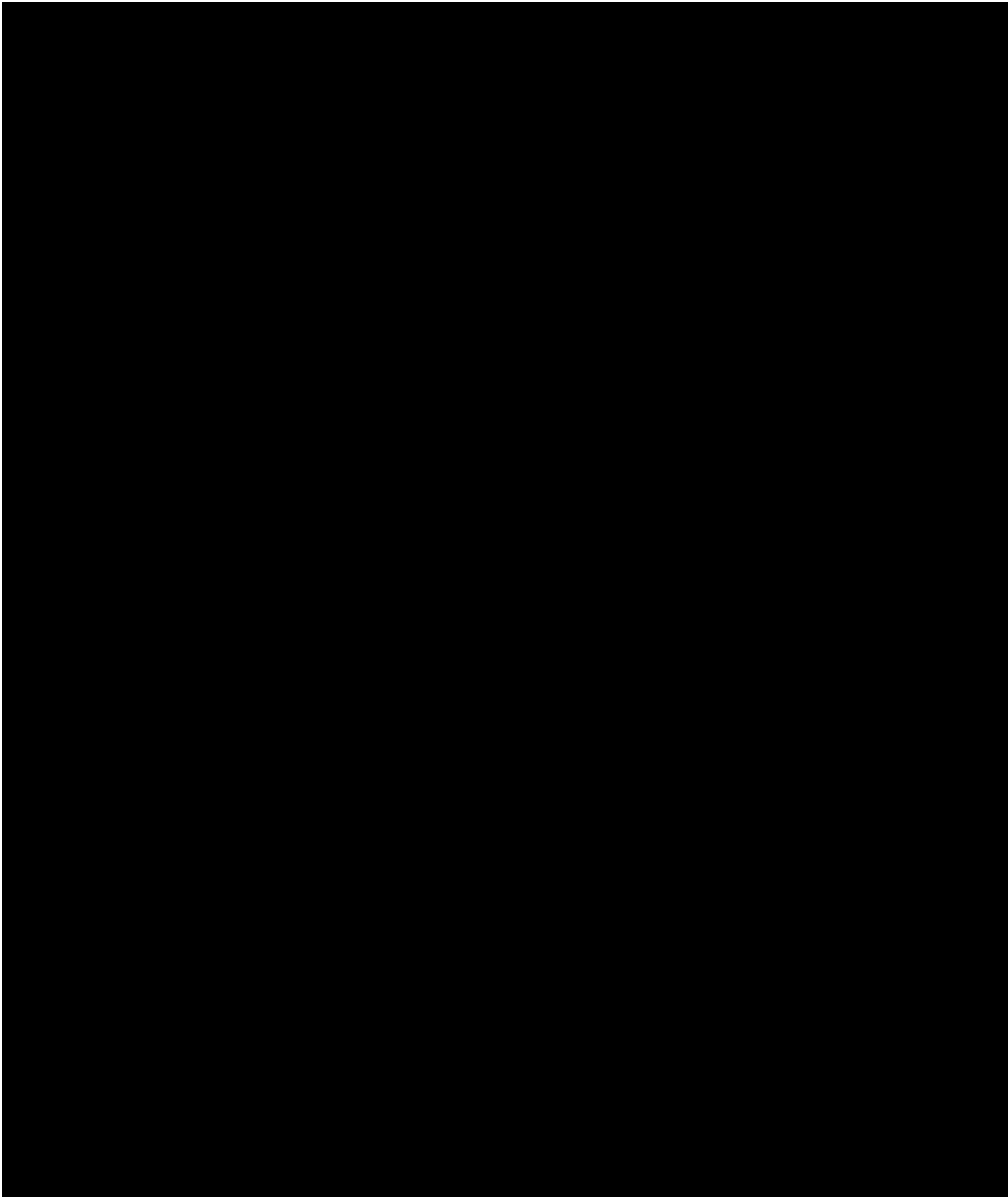


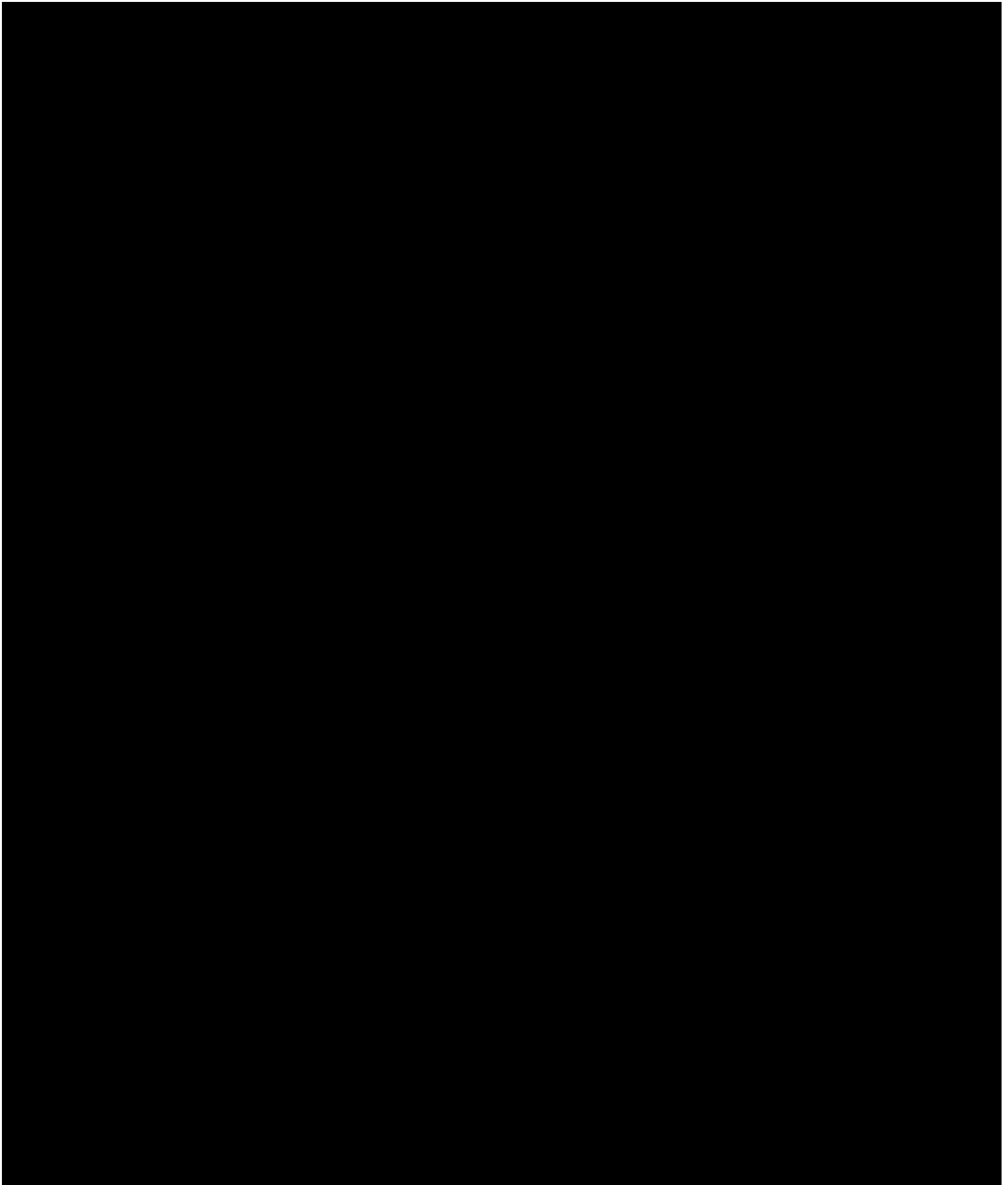












# **EXHIBIT 45**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE	)	
CENTRE GMBH and WEST PUBLISHING	)	
CORPORATION,	)	
	)	
Plaintiffs and	)	
Counterdefendants,	)	
	)	
v.	)	C.A. No. 20-613 (SB)
	)	
ROSS INTELLIGENCE INC.,	)	
	)	
Defendant and	)	
Counterclaimant.	)	

**PLAINTIFFS AND COUNTERDEFENDANTS THOMSON REUTERS ENTERPRISE  
CENTRE GMBH AND WEST PUBLISHING CORPORATION’S RESPONSES AND  
OBJECTIONS TO DEFENDANT AND COUNTERCLAIMANT ROSS INTELLIGENCE  
INC.’S FIRST SET OF COUNTERCLAIM REQUESTS FOR ADMISSION (NO. 136)**

Pursuant to Federal Rules of Civil Procedure 26 and 36 and the Local Rules of the United States District Court for the District of Delaware (the “Local Rules” and each a “Local Rule”), Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GmbH (“Thomson Reuters”) and West Publishing Corporation (“West”) (collectively “Plaintiffs”), hereby respond to Defendant and Counterclaimant ROSS Intelligence Inc.’s (“Defendant”) First Set of Counterclaim Requests for Admission (No. 136), served on September 20, 2022 (the “Requests” and each individually, a “Request”) in the above-captioned action (“Litigation”) as follows:

**GENERAL OBJECTIONS**

1. Plaintiffs’ discovery and investigation in connection with this case is ongoing. Plaintiffs’ response is based on information gathered as of the time of this response. Plaintiffs reserve the right to amend or supplement their response if and when additional information is obtained.

2. Plaintiffs object to the Request to the extent that it purports to impose obligations beyond those set forth in the Federal Rules of Civil Procedure, the Local Rules, or other applicable law.

3. Plaintiffs object to the Request to the extent that it seeks information that is subject to the attorney-client privilege, the work-product privilege, and/or any other applicable privilege or protection. Plaintiffs do not waive, intend to preserve, and are preserving the attorney-client privilege, the work-product privilege, and every other applicable privilege or protection with respect to any information protected by such a privilege or protection.

4. Plaintiffs object to the Request to the extent that it seeks proprietary or confidential business information, trade secrets, or other sensitive information, or documents that contain information that is non-responsive to the Requests. To the extent that the response requires the disclosure of any non-privileged proprietary or confidential information, trade secrets or other sensitive information, Plaintiffs will provide such information pursuant to the Protective Order governing the parties to this Litigation. D.I. 48. By responding to the Request, Plaintiffs do not waive, intend to preserve, and are preserving all of their rights to assert that any and all such information is confidential. Information furnished by Plaintiffs shall be used only in connection with this Litigation and shall not be disclosed, in whole or in part, to any person or entity apart from the parties and their representatives in this Litigation, and only as permitted by the Protective Order.

5. Plaintiffs object to the Request to the extent that it seeks information that Defendant equally may otherwise obtain from public sources, or with less burden and expense by using other means of discovery.

6. In providing this response, Plaintiffs do not in any way waive or intend to waive, but rather are preserving and intend to preserve:

- (i) All objections as to competency, authenticity, relevancy, materiality, and admissibility;
- (ii) All rights to object on any grounds to the use in any subsequent proceedings of any of the responses or information contained herein, including but not limited to the right to object to the trial of this or any other action;
- (iii) All objections as to vagueness and ambiguity; and
- (iv) All rights to object on any grounds to any further requests.

7. Plaintiffs object to the Request to the extent that it seeks information set forth in documents that are outside Plaintiffs' possession, custody, and control.

8. The response below shall not be interpreted to concede the truth of any factual assertion or implication contained in the Request. Plaintiffs' response to the Request in no way constitutes an admission or acknowledgment by Plaintiffs as to the relevancy, materiality, or admissibility of any of the information contained there, and Plaintiffs expressly reserve their rights to object as such.

9. Plaintiffs object to the Request to the extent that it unfairly seeks to restrict the facts upon which Plaintiffs may rely at trial. Discovery has not been completed and Plaintiffs are not necessarily in possession of all the facts and documents upon which Plaintiffs intend to rely. The response submitted herewith is tendered to Defendant with the reservation that the response is submitted without limiting the evidence on which Plaintiffs may rely to support the contentions they may assert at the trial on this Litigation and to rebut or impeach the contentions, assertions,

and evidence that Defendant may present. Plaintiffs reserve the right to supplement or amend this response at a future date.

10. Plaintiffs object to the Request as overly broad to the extent that the Request defines the term “THOMSON REUTERS” to include, “its present and former officers, directors, employees, attorneys, agents, representatives, successors, predecessors, owners, parents, subsidiaries, affiliated companies, or any other person or entity acting or purporting to act on its behalf.” For the purposes of responding to the Request, Plaintiffs will construe this term to mean solely Thomson Reuters Enterprise Centre GmbH, and not any other person or entity.

11. Plaintiffs object to the Request as overly broad to the extent that the Request defines the term “WEST” to include, “its present and former officers, directors, employees, attorneys, agents, representatives, successors, predecessors, owners, parents, subsidiaries, affiliated companies, or any other person or entity acting or purporting to act on its behalf.” For the purposes of responding to the Request, Plaintiffs will construe this term to mean solely West Publishing Corporation, and not any other person or entity.

12. Plaintiffs object to the Request as overly broad to the extent that the Request defines the terms “YOU,” “YOUR,” and “PLAINTIFFS” to incorporate the definitions of the terms “THOMSON REUTERS” and “WEST.” The terms “WEST” and “THOMSON REUTERS” are improperly defined to include West Publishing Corporation’s and Thomson Reuters Enterprise Centre GmbH’s, “present and former officers, directors, employees, attorneys, agents, representatives, successors, predecessors, owners, parents, subsidiaries, affiliated companies, or any other person or entity acting or purporting to act on [their] behalf.” For the purposes of responding to the Request, Plaintiffs will construe the terms “YOU,” “YOUR,” and



“PLAINTIFFS” to mean solely Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation, and not any other person or entity.

13. Plaintiffs object to the Request to the extent it is not limited to the time relevant to this Litigation.

14. Plaintiffs incorporate the foregoing General Objections into its response to the Request as set forth below.

**RESPONSES AND OBJECTIONS TO REQUESTS FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 136:**

Admit that you have never licensed YOUR PUBLIC LAW DATABASE separately from YOUR LEGAL SEARCH TOOLS.

**RESPONSE TO REQUEST FOR ADMISSION NO. 136:**

Plaintiffs incorporate by reference the above-stated General Objections as if fully set forth herein. Plaintiffs specifically object to ROSS’s definitions of Public Law Database and Legal Search Tools because they incorporate disputed questions of fact and law that will be the subject of expert testimony. Plaintiffs further object to this Request to the extent it implies or assumes that Plaintiffs have separate Public Law Database and Legal Search Tools. Plaintiffs deny that they have a Public Law Database separate and apart from Westlaw, a legal research platform. Plaintiffs deny that they have Legal Search Tools separate and apart from Westlaw, a legal research platform. Plaintiffs deny that there are separate product markets or consumer demand for so-called Public Law Databases and Legal Search Tools. Subject to, as limited by, and without waiver of the foregoing objections and denials, Plaintiffs admit that they have never offered a commercial license to a collection of judicial opinions, statutes, and regulations, separate from any search functionality.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

*/s/ Michael J. Flynn*

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October 20, 2022

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Michael J. Flynn (#5333)  
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*Attorneys for Plaintiffs and Counterdefendants  
Thomson Reuters Enterprise Center GmbH  
and West Publishing Corporation*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 20, 2022, copies of the foregoing were caused to be served upon the following in the manner indicated:

David E. Moore, Esquire  
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*/s/ Michael J. Flynn*

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Michael J. Flynn (#5333)

# **EXHIBIT 46**

**THIS EXHIBIT HAS BEEN  
REDACTED IN ITS ENTIRETY**

# **EXHIBIT 47**

**THIS EXHIBIT HAS BEEN  
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# **EXHIBIT 48**



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